

# Development Management DPD: Statement of Consultation

Huntingdonshire LDF | Development Management DPD: Statement of Consultation



	Introduction	1
<b>1</b>	Consultation on the DPD	1
	<b>Community Engagement</b>	<b>1</b>
	<b>Initial Issues and Options</b>	<b>1</b>
	<b>Development of Options</b>	<b>4</b>
	<b>Draft Proposed Submission Consultation</b>	<b>4</b>
<b>2</b>	Developing the DPD	6
	<b>Mitigating and Adapting to Climate Change</b>	<b>6</b>
	<b>Protecting and Enhancing the Environment</b>	<b>13</b>
	<b>Delivering Housing</b>	<b>28</b>
	<b>Supporting Prosperous Communities</b>	<b>39</b>
	<b>Contributing to Successful Development</b>	<b>58</b>
	<b>Monitoring</b>	<b>68</b>
	<b>Draft Policies not taken forward</b>	<b>69</b>
<b>■</b>	Appendices	
<b>1</b>	Comments Received Summer 2007	70
<b>2</b>	Evidence Base and Supporting Documents	108
<b>3</b>	Saved Policies	112
<b>■</b>	Annex A	
	Soundness Self Assessment	117
<b>■</b>	Annex B	
	Legal Compliance Assessment	123
	<b>Stage 1: Inception</b>	<b>123</b>
	<b>Stage 2: Plan Preparation Frontloading</b>	<b>124</b>
	<b>Stage 3: Plan Preparation Formulation</b>	<b>127</b>
	<b>Stage 4: Publication</b>	<b>130</b>
	<b>Stage 5: Submission</b>	<b>132</b>

# Contents

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

## Introduction

When preparing documents which form part of the Local Development Framework, local planning authorities must carry out consultation and engage with communities and stakeholders. The minimum requirements which authorities must achieve are set out in regulations<sup>(i)</sup>. These regulations have been used in conjunction with a range of local documents in determining the ways in which public participation is incorporated into the process of drawing up the DPD.

The Council is required to produce a Statement of Community Involvement (SCI) to augment national regulations and explains when consultation will take place, who will be consulted and what will be done to engage different groups and the general public at each stage. One of the principal aims the Council had when drawing up the SCI was to ensure that everyone with an interest in the District has access to early and effective opportunities to get involved in planning issues that affect them. The Huntingdonshire SCI was adopted in November 2006.

The Council has adopted a Consultation and Engagement Strategy which promotes the role of consultation and engagement to determine community views in the delivery of Council services.

The Sustainable Community Strategy (SCS) sets out a shared vision for the future of the District which was developed from extensive consultation with local communities and an action plan describing the outcomes that need to happen to achieve this vision. The SCS plays an important role in the delivery of the Council's services as it enables the Council to better understand community needs and provides an integrated approach to tackling important issues in the District.

This Statement of Consultation sets out the detail of consultation and engagement undertaken during the preparation of the Development Management DPD and how this was taken into account in the preparation of the Proposed Submission document.

The document is divided into two sections dealing with the consultation stages and the preparation of the Proposed Submission document.

### **1: Consultation on the DPD**

The consultation stages for the Development Management DPD have been:

1. Consultation on Issues and Options - May to July 2007
2. Consultation on Initial Sustainability Appraisal - May to July 2007
3. Consultation on the Sustainability Appraisal Scoping Report (update) - September to October 2007
4. Consultation on Development of Options - January to March 2009
5. Consultation on Development of Options Draft Final Sustainability Appraisal - January to March 2009
6. Consultation on Draft Proposed Submission with Key Stakeholders - December 2009 to January 2010

Prior to these stages, community engagement was carried out during 2003 as part of preparation for an earlier version of the combined Core Strategy and Development Control Policies DPD. That DPD was later withdrawn but the information that the Council gained from this earlier engagement has informed subsequent plan production. For more information on earlier engagement please see the Submission Core Strategy 2008: Statement of Consultation.

---

i Town and Country Planning (Local Development) (England) Regulations 2004 as amended

# Introduction

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

## 2: Developing the DPD

Section 2 presents details of how the Proposed Submission document has been developed. This includes details of the analysis of reasonable alternatives considered and summaries of the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) processes. It also provides explanation as to why the Council is not proposing policies for some topics.

Each policy area is set out as follows:

Introduction	A brief introduction on the policy was drawn up
Summary of Consultation	A summary of the issues and options identified in the consultation stages is presented along with a summary of comments received. For later stages of consultation summaries of the scope of comments on draft policies are presented and any comments received on the Draft Proposed Submission document.
Summary of Sustainability Appraisal	A summary of the recommendations and conclusions of the Initial, Draft Final and Final Sustainability Appraisal Reports.
Assessment	Information about how the policy was drawn up, including the assessment of consultation responses and the alternative approaches considered.
Proposed Submission Policy	Information about the objectives and policies of the Core Strategy that the policies will support.
Proposals Map	Where there is a need for a designation on the Proposals Map, this is identified. Reference should be made to the supporting document - Development Management DPD: Proposed Submission Proposals Maps.
Supports the East of England Plan	Information about the policies of the East of England Plan that the policy will support.
Supports the Sustainable Community Strategy	Information about the strategic themes and outcomes of the Sustainable Community Strategy that the policy will support.

### Soundness Self Assessment

One of the main assessments of any Proposed Submission DPD is whether the document passes the Tests of Soundness. To enable planning authorities to assess whether their plans are sound the Planning Advisory Service has developed a soundness test. The Soundness Test has been completed for the Development Management DPD and is presented in Annex A.

### Legal Compliance Assessment

The other main assessment of any Proposed Submission DPD is whether the document is legally compliant. To enable planning authorities to assess whether their plans are legally compliant the Planning Advisory Service has developed a legal compliance tool. The Legal Compliance Tool has been completed for the Development Management DPD and is presented in Annex B.

## 1 Consultation on the DPD

### Community Engagement

**1.1** Prior to June 2008 the 2004 Regulations determined the process that planning documents had to go through. These regulations were amended in June 2008 by the 2008 regulations. These amendments removed the specific requirement for the Preferred Options Stage of consultation, instead placing more emphasis on public engagement as part of the Issues and Options stage. The regulation amendments also separated the publication of the plan from submission to the Secretary of State, which introduced the opportunity for review and amendment before plans are submitted.

**1.2** As the public engagement for the Development Management DPD started under the original unamended regulations with the Issues and Options Consultation in May 2007 the preparation of the DPD has been subject to both sets of regulations. Each section therefore includes notes about the regulations that were applicable at the time.

### Initial Issues and Options

**1.3** The Council started work on the Development Management DPD (then known as the Development Control Policies DPD) in summer 2007. The main part of public engagement was the publication of an 'Issues and Options Report' in May 2007. The purpose of the report was to explain the main issues facing the District in terms of planning and the choices which needed to be made. It was intended to generate discussion and debate about the problems the LDF will need to address and the opportunities for dealing with them.

**1.4** Consultation on the report ran from 25 May to 7 July 2007 and was accompanied by the Initial Sustainability Appraisal. A range of methods were used to support and publicise consultation on the report as follows:

**Table 2 Events and Actions for Consultation on the Initial Issues and Options for the Development Management DPD**

Event/Action	Date
Press Release?	
Letters/e-mails sent to consultation bodies (see below)	23 May 2007
Issues and Options Report, Initial SA and Response Forms available on Council's website	Throughout the consultation period
Issues and Options Report, Initial SA and Response Forms made available at Council Offices and libraries/ e-learning points	Throughout the consultation period
Town and Parish Council Seminar	21 June 2007

**1.5** Events were undertaken for a further phase of consultation to help the Council establish options and clarify the views of stakeholders for the Core Strategy. While these events and actions were primarily part of consultation for the Core Strategy they enabled the Council to further clarify views of stakeholders on issues for the Development Management DPD.

**Table 3 Events and Actions for Consultation for Towards a Spatial Strategy for Huntingdonshire**

Event/Action	Date
Presentation to Heads of Service Board	16 August 2007

# 1 Consultation on the DPD

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Event/Action	Date
Meeting with Environment Agency	6 August
Meeting with Environment Agency	18 August 2007
Meeting with Defence Estates (Brampton)	7 June 2007
Meeting with Hinchingsbrooke School and Officers from County Council	9 September 2007
Meeting with Hinchingsbrooke Hospital	5 September 2007
HSP - Housing, Health and Social Care	6 September 2007
HDC Members Briefing	11 September 2007
Meeting with Landowners of St Johns business park	12 September 2007
Key stakeholder seminar	12 September 2007
Presentation for Ramsey Town Council	13 September 2007
Meeting with landowners (west Huntingdon Town Centre)	14 September 2007
Presentation for St Neots Town Council	19 September 2007
Rapid Health Impact Assessment	26 September 2007
Landowners (North Huntingdon)	27 September 2007
Presentation for St Ives Town Council	3 October 2007
Meeting with Developers (East of the Railway, St Neots)	15 October 2007
Alan Hampton - Parish Plans[Query inclusion]	5 November 2007
Copies of Towards a Spatial Strategy for Huntingdonshire sent to Specific Consultation Bodies (see below)	4 September 2007
Initial Sustainability Appraisal of Towards a Spatial Strategy for Huntingdonshire made available on the Council's website	November 2007
Workshop held with Cambridgeshire County Council	3 October 2007

**1.6** The following tables identify those consultation bodies that were contacted prior to publication of the Issues and Options Report and the publication of Towards a Spatial Strategy for Huntingdonshire.

**Table 4 Specific Consultation Bodies (SCI Appendix 6)**

<p>Anglian Water, Bedford Borough Council, Bedfordshire County Council, BT, Cambridgeshire and Peterborough Biodiversity Partnership, Cambridgeshire and Peterborough Public Health Network, Cambridgeshire County Council, Cambridgeshire Constabulary, Cambridgeshire Horizons, Cambridgeshire Primary Care Trust, Cambridge Water, East Cambs District Council, East Midlands Development Agency, East Northants District Council, East of England Development Agency, East of England Regional Assembly, East of England Strategic Health Authority, English Heritage, Environment Agency, Eon, Fenland District Council, GO-East, Greater Peterborough Primary Care Trust, Highways Agency, Hinchingsbrooke Health Care Centre NHS, Mid Bedfordshire District Council, Mobile Operators Association, Natural England, National Grid Property, Network Rail, Northamptonshire County Council, N Power, Peterborough City Council, South Cambridgeshire District Council, Sport England.</p>
---



All 84 Town and Parish Councils within the District

**Table 5 Other Consultation Bodies**

Accent Nene Housing Association; Alconbury and Ellington Drainage Board; Aldwyck Housing Association; Alexanders; Alsop Verrill Town Planning; Anchor Trust; Andrew S Campbell Associates; Anglia Support Partnership; Antony Asbury Assoc; Appletree Homes Ltd; ARUP; Atkins; Axiom Housing Association; Barton Wilmore; Bedfordshire and Cambridgeshire Rural Support; Bedfordshire Pilgrims Housing Association; Bewick Homes; Bidwells; Bloor Homes; Bluesky Planning; Boyer Planning; British Horse Society Cambridgeshire; British Wind Energy Assoc; Bryant Homes; Business Link East; CABE; Cambridgeshire and Peterborough Association of Local Councils; Cambridgeshire ACRE; Cambridgeshire Bat Group; Cambridgeshire Countryside Watch; Cambridgeshire Enterprise Services; Cambridge Housing Society; Cambridgeshire Local Access Forum; CAMRA; Camstead Homes; Carter Jonas; Centre for Ecology and Hydrology; Charles Planning Ltd; Cheffins; Church Commissioners; Circle Anglia; Civic Society of St Ives; Civic Trust; Country Land and Business Association; Countryside Properties; CPRE Cambridgeshire; Croudace Homes Ltd; The Crown Estate; Davidson Business; David Wilson Estates; David Wilson Homes; De Clifton; Dev Plan UK; D H Barford & Co; Disability Information Service Huntingdonshire; DLP Planning; Ely Diocese; Eversheds LLP; Fairhurst; Fisher German; Fitch Butterfield Associates; Flagship Housing; Forestry Commission; Four Seasons Day Centre; Foxley Tagg Planning Ltd; Francis Jackson Estates; Freight Transport Association; Friends of the Earth; FSB Huntingdonshire; George Wimpey; Granta Housing; Great Ouse Boating Association; Guinness Trust; The Gypsy Council; Hallam Land Management; Hanover Housing Association; Hargrave Conservation Society; Harris Lamb Chartered Surveyors; Hartford Conservation Group; Henry Bletsoe & Son; Home Builders Federation; Housing 21; Howard Sharp and Partners; Huntingdon and District Bus; Huntingdon CAB; Huntingdon Mencap; Huntingdonshire and Godmanchester Civic Society; Huntingdon Town Centre Partnership; Hunts MIND; Hunts Society for the Blind; Hutchinson's; Inland Waterway Association (Peterborough Branch); J & J Design; Januarys; JDI Solutions; Jennifer Lampert Associates; John Martin & Assoc; Jones Day Solicitors; Kier Residential; Larkfleet Homes; Levvel Ltd; Levitt Partnership; Luminus; Meridian; Middle Level Commissioners; Miller; Minster Housing Association; Mono Consultants; Nash Partnership; National Playing Fields Association; National Trust; Optical Activity; Paul and Company; Peacock and Smith; Pegasus Planning Group; Peterborough Conservation Volunteers; Peterborough Diocese; Peterborough Environment City Trust; Phillips Planning; Planning Aid; The Planning Bureau Ltd; Planning Potential; Ramsey Town Centre Partnership; Rapleys; Renewables East; Richmond Fellowship Employment and Training; Robert Doughty Consultancy Limited; RPS Planning; RPS Warren; RSPB; Savills; Smiths Gore; Smith Stuart Reynolds; Somersham and District Day Centre; Spacelab; Stamford Homes; Stewart Ross Associates; Stilton Community Association; St Ives Chamber of Commerce and Industry; St Neots and District Chamber of Commerce; St Neots Liberal Democrat Group; St Neots Youth Town Council; Sustrans; Swaversey District Bridleways Association; Terence O'Rourke Ltd; Varrier Jones Organisation; Oxmoor in Bloom; Vincent and Gorbing Chartered Town Planners and Architects; The Wildlife Trust for Bedfordshire, Cambridgeshire, Northamptonshire & Peterborough; The Woodland Trust; Woods Hardwick Planning.

Government Departments: Department for Transport, OFSTED, Defence Estates Operations.

All consultees and agents registered on the Council's Limehouse database

## Form of Consultation and Representations Received

**1.7** The Issues and Options Report posed a number of questions in order to gauge people's views on the issues the Council had identified, possible solutions and whether particular topics should be addressed. The majority of questions asked respondents whether they agreed or disagreed with possible options, some of the questions were 'open questions,' that encouraged longer answers, for example how people thought policies or options could be improved.

# 1 Consultation on the DPD

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**1.8** In all, nearly 500 comments were received from a wide range of stakeholders including members of the public, landowners, agents, various public bodies, Parish and Town Councils and Local Councillors. As consultation responses at this stage are not available on the Council's consultation website individual summaries are presented in Appendix 1 'Comments Received Summer 2007'. Summaries of the issues raised in comments relating to specific policies are presented in Section 2 'Developing the DPD'.

## Development of Options

**1.9** The Development of Options document was published in January 2009 and was made available for comment between 30 January 2009 and 27 March 2009. Due to a minor technical issue with the consultation website, which affected the submission of some comments, the consultation period was extended until 30 March 2009. During the consultation the document and supporting information was available at the Council's main offices in Huntingdon, Libraries and e-learning points within the District and was available to download and to view via the Council's website and consultation website.

### Press Notice

**1.10** A press release was issued[Query details]

### Consultation Bodies

**1.11** Consultation bodies and stakeholders were contacted to publicise the consultation as follows:

- Specific Consultation Bodies (As per list above for Issues and Options) were sent hard copies of DPD and a link to the SA (GO–East were also sent a hard copy of the SA)
- Parish and Town Councils (84) were sent letters and links to both DPD and SA apart from Needingworth who had previously requested that hard copies be sent
- Libraries and Access Points (As per list below) were sent hard copies of both the DPD and the SA with a covering letter
- Consultees and Agents registered on the Limehouse database received emails

**1.12** Libraries and Access Points:

**1.13** [List libraries and access points]

### Form of Consultation

**1.14** The Development of Options document was published with a form for comments that gave respondents the opportunity to comment on any part of the document. The form asked respondents whether they supported, objected or had observations and what their comment was. Respondents were also asked to provide a summary. The same form was used for the accompanying consultation on the Draft Final Sustainability Appraisal.

### Representations on Development of Options

**1.15** In all, just over 300 comments, including those on the Draft Final Sustainability Appraisal, were received from a wide range of stakeholders. Summaries of the issues raised in comments relating to specific policies are presented in Section 2 'Developing the DPD'. The detail of all comments are available on the Council's [Consultation Portal](#).

## Draft Proposed Submission Consultation

**1.16** The comments received during the Development of Options were considered and during the summer of 2009 discussions with a range of partners and key consultation bodies helped inform drafting the Proposed Submission plan. During this drafting process the Council decided that in order to properly address the concerns of consultees that significant changes were needed to the structure of the plan from that presented during the

Development of Options consultation. Changes to draft policies were less significant but together the changes meant that the draft plan looked substantially different. With these changes in mind the Council decided to consult a group of key bodies before publishing the Proposed Submission plan.

**1.17** The bodies that were consulted were chosen from the Council's database where it was considered that they:

- had submitted comments which contributed to changes to the structure of the plan;
- had been involved in discussions which contributed to changes to the structure of the plan; or
- were considered key bodies in determining the soundness of the plan.

**Table 6 Consultees identified and consulted on the Draft Proposed Submission**

British Marine Federation	GO-East
Buckden Marina	Henry H Bletsoe and Son (agents)
Cambridgeshire County Council	The Highways Agency
Connolly Homes (agents for)	John Martin and Associates (agents)
CPRE Cambridgeshire	Natural England
Cushman and Wakefield LLP (agents)	Planning Potential (agents)
D H Barford and Co (agents)	Smiths Gore (agents)
The East of England Regional Assembly	Southern Planning Practice (agents)
English Heritage	Sport England
Environment Agency	The Wildlife Trust for Bedfordshire, Cambridgeshire, Northamptonshire & Peterborough
The Fairfield Partnership	

**1.18** Comments on the draft Proposed Submission plan were sought between Friday 18 December 2009 and Monday 11 January 2010.

**1.19** 48 responses were received from 9 consultees. Issues relating to the clarity of a wide range of policies and paragraphs, consistency between policies and other parts of the LDF and the arrangements for monitoring were raised. The detail of how the Council responded to these issues in detail in the 2 'Developing the DPD' section of this document.

# 2 Developing the DPD

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

## 2 Developing the DPD

2.1 Some explanation of reorganisation of policy groupings consistent with other policy chapter detail.

### Mitigating and Adapting to Climate Change

2.2 [Brief explanation of the grouping of Climate Change policies needed here]

### Sustainable Design

2.3 This policy was drawn up following the Development of Options consultation. Some elements of the policy formed parts of a draft policy for design quality and a draft policy for water management.

#### Summary of Consultation

2.4 The Issues and Options consultation identified the need to ensure development is built and constructed to maximise the sustainability of development. It identified the option for policies to encourage compliance with the Code for Sustainable Homes which at the time was voluntary scheme. During the Issues and Options consultation a wide variety of comments were made. In relation to design issues the use of the Design Guide was both supported and questioned and there was concern about repeating national guidance. Broader comments relating to tackling climate change expressed concern about how to address the problems through planning policies.

2.5 A wide variety of criteria were suggested making use of existing sources of guidance, statutory designations and various forms of local design guidance. Concerns were raised that the need to promote high quality design is covered in the requirements of Design and Access Statements and should not be repeated in the development control policies. Most detailed responses at the initial Issues and Options stage were concerned with design issues and have informed development of the Development Context policy.

2.6 At the Development of Options stage most comments were specifically related to the draft policies presented. Comments on the draft policy for Design Quality were generally supportive. Comments on other parts of the Development of Options document and more general comments identified potential for specific policy requirements for adaptation and mitigation of the impacts of climate change.

2.7 Comments from key consultees on the Draft Proposed Submission related to the clarity of the policy and possible duplication with building regulations and government policy.

#### Summary of Sustainability Appraisal

2.8 The policy was not assessed at the Initial or Draft Final SA stages.

#### Assessment

2.9 Assessment of comments received on the Development of Options concluded that policies that dealt specifically with the adaptation and mitigation of climate change impacts were justified. More specifically the area of policy coverage that was not addressed to a great extent was the specification of how new buildings should deal with adaptation and mitigation.

2.10 It was recognised that there is a wide range of national policy, guidance and standards and this is a rapidly changing area. There are a number of issues that are important for Huntingdonshire relating to the predicted impacts of climate change in conjunction with national and regional issues a local policy is justified. This gave the opportunity to clarify policy expectations and to give potential developers certainty about requirements.

**2.11** In discussion with partners it was decided to draft a new policy that identified criteria that would help ensure climate change was fully taken into account when designing buildings. The criteria were backed by requirements to meet levels in either the Code for Sustainable Homes (CSH) or the Building Research Establishment Environmental Assessment Method (BREEAM) or successor standards. There is a national requirement for all new homes to be assessed against the CSH.

**2.12** The policy was amended to address issues of clarity raised in comments on the Draft Proposed Submission. No changes were made with regard to issues of duplication as both the CSH and BREEAM cover a wide range of sustainability matters that are not and would not be covered by building regulations.

### Proposed Submission Policy

**2.13** Policy C 1 Sustainable Design will support delivery of Core Strategy Objectives 2, 12, 13 and 16 and Policy CS1 Sustainable Development in Huntingdonshire.

### Proposals Map

**2.14** Policy C 1 Sustainable Design does not require any designations on the Proposals Map.

#### Supports the East of England Plan

**Policies:** ENV7: Quality in the Built Environment  
ENG1: Carbon Dioxide Emissions and Energy Performance  
WAT1: Water efficiency

#### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Appropriate flood risk management, sustainable water supply and sufficient provision of utilities including the development of local renewable sources of energy New and upgraded homes and other buildings which are well designed, well maintained and contribute to lowering carbon emissions
Environment	Mitigate and adapt to climate change Efficient use of resources

## Carbon Dioxide Reductions

**2.15** This policy was drawn up for the Development of Options consultation where it was consulted upon as a draft policy for carbon dioxide reductions.

### Summary of Consultation

**2.16** The Issues and Options consultation identified the need to ensure that the sustainability of development is maximised. It identified the option to draw up policies to encourage compliance with the Code for Sustainable Homes (CSH).

## 2 Developing the DPD

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**2.17** Comments on the issues and options were mixed, but support for the use of the CSH was expressed. There were those who favoured relying on changes to build regulation requirements. Water and energy use were also identified as important factors.

**2.18** Comments on the draft policy for carbon dioxide reductions were mixed with some support for the principle, however there were concerns raised about the approach taken specifically in relation to the proposed thresholds and viability issues. The proposed percentage and the Council's approach to seeking reductions in CO<sub>2</sub> rather than energy, as required by East of England Plan policy ENG1, were not questioned. Comments specifically questioned whether transport emissions should be included and whether a threshold should be set for a minimum reduction or specification of a minimum level for the percentage to be measured from. The alternative of relying on changes to Building Regulations as currently proposed by Government received some support.

**2.19** Comments from key consultees on the Draft Proposed Submission related to the clarity of the policy.

### Summary of Sustainability Appraisal

**2.20** The Initial SA concluded that the option was sustainable and in particular contributes to reducing energy and resource use and to minimising the effects of climate change.

**2.21** The Draft Final SA concluded that the draft policy was sustainable and consistent with national and regional policy. It noted that it could be useful to include, in the supporting text, explanations of renewable energy technologies and low carbon technologies as this would guide the implementation of the policy.

### Assessment

**2.22** The alternative of seeking energy reductions (rather than CO<sub>2</sub> reductions) as required by East of England Plan policy ENG1 had been considered prior to drawing up the draft policy. The Council remained convinced that seeking CO<sub>2</sub> reductions was the right approach to be taking.

**2.23** The Council decided that the justification for the threshold put forward in the draft policy (500m<sup>2</sup>) was not sufficiently robust and so changed the threshold to the standard definition for major development. The policy was also modified so that the overall approach, how viability should be considered and the exceptions were clearer. Reference to the use of 'allowable solutions' was added to the policy.

**2.24** The issue of minimum reductions was considered. The policy is intended to promote the reduction of CO<sub>2</sub> first through energy efficiency measures before calculating the total predicted CO<sub>2</sub> emissions. In this way the policy should bring about a total reduction of CO<sub>2</sub>, from a building that only meets current building regulations as it would not be cost effective to only achieve the required reduction. The alternative of specifying that the percentage reduction should be from building regulations (or a level of the Code for Sustainable Homes) would not promote additional energy efficiency measures that would also reduce emissions.[Rewording necessary]

**2.25** The Government has proposed to change building regulations to reduce the allowable level of CO<sub>2</sub> emissions from new buildings. The alternative to rely on such changes was discounted. This alternative was not considered to be the most sustainable option available; it is not clear whether the Government will be able to make changes as it originally had hoped. PPS1: Supplement on Planning and Climate Change is clear that local planning authorities should seek to ensure that CO<sub>2</sub> reductions targets are achieved. There is no programme for the reductions the Government has said it wishes to achieve and so there is no certainty over the plan period. The East of England Plan policy ENG1 sets out the regional approach but makes it clear that local planning authorities in the East of England should establish their own approach.

**2.26** The policy was amended to address issues of clarity raised in comments on the Draft Proposed Submission.

## Policy

**2.27** Policy C 2 Carbon Dioxide Reductions will support delivery of Core Strategy Objectives 2, 12, 13 and 16 and Policy CS1 Sustainable Development in Huntingdonshire.

## Proposals Map

**2.28** Policy C 2 Carbon Dioxide Reductions does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policies:** ENV7: Quality in the Built Environment  
ENG1: Carbon Dioxide Emissions and Energy Performance  
ENG2: Renewable Energy Targets

### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Appropriate flood risk management, sustainable water supply and sufficient provision of utilities including the development of local renewable sources of energy New and upgraded homes and other buildings which are well designed, well maintained and contribute to lower carbon emissions
Environment	Mitigate and adapt to climate change

## Renewable and Low Carbon Energy

**2.29** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for renewable and low carbon energy.

### Summary of Consultation

**2.30** The Issues and Options consultation identified the increasing occurrence of renewable energy development proposals and the need to minimise the environmental impacts of renewable energy development. It put forward the option of a criteria based policy that would seek to minimise the impact of renewable energy development on the character and appearance of the surrounding landscape and on sites of national and international importance for conservation. It was also proposed that this option should require the removal of redundant equipment.

**2.31** There was a very limited response. Two comments strongly supported the proposed option providing that adverse impacts on wildlife are avoided by the appropriate siting, design and operation of renewable energy generating schemes.

**2.32** For the Development of Options comments on the draft policy were broadly supportive, although issues were raised in relation to registered historic parks and gardens and impacts on biodiversity.

**2.33** Comments from key consultees on the Draft Proposed Submission related to the clarity of the policy.

# 2 Developing the DPD

## Summary of Sustainability Appraisal

**2.34** The Initial SA found the option to be sustainable and consistent with national policy. It recommended that greater clarity could be added to specify that this policy refers to large/ commercial development as opposed to microgeneration which is covered by changes to Permitted Development Rights<sup>(ii)</sup>.

**2.35** The Draft Final SA concluded that the draft policy was consistent with national policy and that as the long term benefits of renewable energy generation outweighed the short term visual detriments of provision, a supportive policy was sustainable.

## Assessment

**2.36** Responses to the proposed option concerned with protection of wildlife were considered to be addressed by the Biodiversity and Protected Habitats and Species policy that has been clarified (for details see 'Biodiversity and Protected Habitats and Species'). No alternative approaches were suggested through the consultation process.

**2.37** An alternative option of relying on National and Regional policy was considered but rejected on the basis that national policy (PPS22, amended by the PPS1 Supplement) places certain expectations on Local Planning Authorities and the locally specific approach to renewable energy development was well established and based on robust evidence.

**2.38** The draft policy wording has been modified to aid clarity. The policy was amended to address issues of clarity raised in comments on the Draft Proposed Submission and to minimise potential conflict with national policy.

## Proposed Submission Policy

**2.39** Policy C 3 Renewable and Low Carbon Energy will support delivery of Core Strategy Objectives 12, 13, and 16 and Policy CS1 Sustainable Development in Huntingdonshire.

## Proposals Map

**2.40** Policy C 3 Renewable and Low Carbon Energy does not require any designations on the Proposals Map, however Landscape Character Areas are identified on the Landscape Character Areas plan that accompanies the Proposal Map.

### Supports the East of England Plan

**Policies:** ENV7: Quality in the Built Environment  
ENG1: Carbon Dioxide Emissions and Energy Performance  
ENG2: Renewable Energy Targets

ii Brought into primary legislation through Statutory Instrument 2008 No 675



## Supports the Sustainable Community Strategy

### Strategic Themes: Outcomes:

Growth and infrastructure

Appropriate flood risk management, sustainable water supply and sufficient provision of utilities including the development of local renewable sources of energy  
New and upgraded homes and other buildings which are well designed, well maintained and contribute to lower carbon emissions

Environment

Mitigate and adapt to climate change

## Air Quality Management

**2.41** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for air quality management.

### Summary of Consultation

**2.42** Issues and Options relating to air quality were not identified for the Issues and Options consultation but were raised through discussions between Council departments and the Council's partners. At the Development of Options stage there was only one comment on the draft policy which was supportive.

### Summary of Sustainability Appraisal

**2.43** The Draft Final SA concluded that the draft policy was sustainable, locally specific and that it expanded on limited national guidance.

### Assessment

**2.44** Having identified opportunities to help address air quality in general and in particular in air quality management areas and the benefits in terms of public health and impact on European Sites a locally specific policy is justified. The alternative option of relying on national policy was not considered appropriate. The draft policy has been modified to aid clarity.

### Proposed Submission Policy

**2.45** Policy C 4 Air Quality Management will support delivery of Core Strategy Objectives 12 and 16 and Policy CS1 Sustainable Development in Huntingdonshire.

### Proposals Map

**2.46** Policy C 4 Air Quality Management does not require any designations on the Proposals Map, however reference should be made to air quality management areas.

## Supports the East of England Plan

**Policies:** ENV7: Quality in the Built Environment  
ENG1: Carbon Dioxide Emissions and Energy Performance

# 2 Developing the DPD

## Supports the Sustainable Community Strategy

Strategic themes:	Outcomes:
Growth and infrastructure	Sustainable patterns of growth and development New and upgraded homes and other buildings which are well designed, well maintained and contribute to lower carbon emissions
Environment	Mitigate and adapt to climate change An environment that is protected and improved

## Flood Risk and Water Management

**2.47** This policy was drawn up following the Development of Options consultation where it was consulted on as the draft policy for flood risk and part of the draft policy for water management.

### Summary of Consultation

**2.48** The Issues and Options consultation identified the need to minimise the risk of flooding in new developments and identified the option to draw up policies with criteria to ensure that development proposals minimise and manage the risk of flooding.

**2.49** A concern shared by several respondents was that any policy should encompass minimising the risk of flooding in existing development as well as new development. Other issues identified included the role of the Environment Agency and the approach that should be taken for different types of development as identified in PPS25. The use of SUDs was supported although the consensus was that they should not necessary be imposed upon all development schemes. The issue of water management was also raised.

**2.50** For the Development of Options consultation there was only one comment received on the draft policy for flood risk, which was supportive. Comments on other policies and more general comments identified flooding as an important issue but did not raise specific concerns other than to identify recreational boating as a compatible use. Comments on the draft policy for water management were mixed. The principle of the policy was broadly supported, however comments identified general and specific problems with the draft wording relating in particular to the proposed requirements for meeting water efficiency elements of the Code for Sustainable Homes.

### Summary of Sustainability Appraisal

**2.51** The Initial SA concluded that the option is consistent with national policy. it is particularly important given the landscape character of the District and susceptibility of parts of the District to flooding.

**2.52** The Draft Final SA concluded that a policy for flood risk would be particularly important given the landscape character and resulting susceptibility to flooding within some parts of the District. It was noted that the draft policy was consistent with national policy and provides flexibility in permitting development in areas of low risk providing appropriate mitigation measures are employed.

**2.53** The Draft Final SA concluded that the draft policy for water management was sustainable and consistent with national guidance encouraging appropriate water management and, where possible, use of SUDs. It was noted that it was in line with national advice regarding implementation of the Code for Sustainable Homes. It was identified that the policy could consider promoting the use of permeable surfaces for car parking.

## Assessment

**2.54** The issue of flood risk is an important issue to Huntingdonshire given its topography and relationship with the Great Ouse and the Fens. The main concern in most of the comments related to the need to minimise flood risk in new development and existing built up areas was considered to have been addressed in the draft policy. However the policy wording has been clarified in this respect. No reasonable alternative was identified in the Issues and Options paper and none have been identified through the consultation process. The Council does not consider there to be any reasonable alternatives.

**2.55** Following comments on the draft policy and more general comments concerning mitigation and adaptation to climate change the requirements in relation to the Code for Sustainable Homes were replaced with requirements in Policy C 1 Sustainable Design.

## Proposed Submission Policy

**2.56** Policy C 5 Flood Risk and Water Management will support delivery of Core Strategy Objectives 12, 13, and 16 and Policy CS1 Sustainable Development in Huntingdonshire.

## Proposals Map

**2.57** Policy S10 Flood Risk does not require any designations on the Proposals Map [Query Areas of flood risk].

### Supports the East of England Plan

**Policy:** WAT4: Flood Risk Management

### Supports the Sustainable Community Strategy

**Strategic Themes:** **Outcomes:**

Growth and infrastructure

Appropriate flood risk management, sustainable water supply and sufficient provision of utilities including the development of local renewable sources of energy

Environment

Mitigate and adapt to climate change  
Efficient use of resources

## Protecting and Enhancing the Environment

**2.58** Brief details about re-organisation of policies needed with regard to Protecting and Enhancing the Environment chapter.

## Development Context

**2.59** This policy was drawn up following the Development of Options consultation where it was consulted on as part of the draft policy for design quality and part of the draft policy for water management.

# 2 Developing the DPD

## Summary of Consultation

**2.60** With regards to Design Quality the initial Issues and Options consultation identified that there is a need to promote a high standard of design on development. The main option identified proposed policies that would require a high quality of design with criteria to enable assessment. Additionally it was noted that policies should seek sufficient supporting information to accompany development proposals to demonstrate design considerations taken into account.

**2.61** The Issues and Options report included a section on street scene which identified the issue of creating and maintaining a high quality public realm. It identified that policies should require proposals to make positive contributions to the character and appearance of streets and public places and that the policies should include criteria which would be used to assess this.

**2.62** Comments on these sections of the Issues and Options Report were mixed. While there was support for policies addressing design issues there was concern about repeating national policy and guidance and how the policies would relate to requirements for design and access statements.

**2.63** Comments on the draft policy for Design Quality were largely supportive. Comments particularly identified support for the inclusion of links to the Design Guide SPD and Landscape and Townscape SPD as well as the requirements to incorporate or link with open spaces and green corridors. Support was also expressed for the requirement to incorporate a clear network of routes in development. Comments on the draft policy for water management were mixed. The principle of the policy was broadly supported, however comments identified general and specific problems with the draft wording.

## Summary of Sustainability Appraisal

**2.64** The initial SA concluded that the design quality option was in line with policy on sustainable communities and is supported by more specific policies elsewhere in the document. It concluded that the street scene option was sustainable but noted that careful consideration would be need to ensure all potential impacts are recognised.

**2.65** The Draft Final SA concluded that the draft policy on design quality met a number of the SA objectives and was therefore sustainable. This draft policy was in line with government guidance on sustainable communities and was supported by other strategic policies in the emerging Core Strategy eg sustainable development and the spatial strategy. It recommended that explicit reference could be included to settlement character in criterion ii to help protect against inappropriate development that would not respect settlement character or context.

**2.66** The Draft Final SA concluded that the draft policy on water management was sustainable and consistent with national guidance encouraging appropriate water management and, where possible, use of SUDs. It was noted that it was in line with national advice regarding implementation of the Code for Sustainable Homes. It was identified that the policy could consider promoting the use of permeable surfaces for car parking.

## Assessment

**2.67** The Huntingdonshire Design Guide (2007) and Huntingdonshire Townscape and Landscape Assessment (2007) Supplementary Planning Documents provide detailed information on materials used locally, the character of development across the District and an assessment of the landform and geology which contributes to the materials used and the context of development. These two documents are considered to provide the evidence that a locally specific approach is appropriate.

**2.68** The policy is intended to ensure design is locally distinctive. The policy will work alongside requirements to produce Design and Access Statements and does not replace the obligation to produce these. Due to the necessity for design to respond to its context it is important to have a locally distinctive policy and it is therefore not appropriate to rely on national guidance.

**2.69** Following comments on the draft policy for water management the requirements in meeting the levels set out in the Code for Sustainable Homes for water efficiency have been replaced with the requirements of the Sustainable Design policy.

## Proposed Submission Policy

**2.70** Policy E 1 Development Context will support delivery of Core Strategy Objectives 8, 10, 11, 12, 13 and 18 and Policies CS1 Sustainable Development in Huntingdonshire and CS3 Settlement Hierarchy.

## Proposals Map

**2.71** Policy E 1 Development Context does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policies:** SS2: Overall Spatial Strategy  
ENV6: The Historic Environment  
ENV7: Quality in the Built Environment

### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	New and upgraded homes and other buildings which are well designed, well maintained and contribute to lower carbon emissions
Environment	An environment that is protected and improved

## Built-up Areas

**2.72** This policy was drawn up following the Development of Options consultation where the policy formed part of a draft policy for development in the countryside.

### Summary of Consultation

**2.73** At the Issues and Options stage consultation concentrated on issues of how to protect character of our settlements and countryside and whether this should be done using a criteria based policy or through the use of defined boundaries on the Proposals Map. At this stage comments were mixed but broadly supported the principles of protecting settlement character, particularly for smaller villages and the edges of settlements. Defined boundaries of some form received much support.

**2.74** Comments on the draft policy for Development in the Countryside were mixed but were generally not supportive. The approach to defining the built-up area in particular was objected to. Comments also questioned consistency of the draft policy with the Core Strategy.

**2.75** It was proposed that the policy should include reference to identified directions of growth in comments on the Draft Proposed Submission.

# 2 Developing the DPD

## Summary of Sustainability Appraisal

**2.76** The initial SA concluded that the option was sustainable and consistent with current policy but noted that there is a cumulative effect as restrictions on development in the countryside may give rise to development pressures within settlements. It recommended that careful wording of the policy will be required to ensure the specific circumstances in which development will be permitted in the countryside are clear.

**2.77** The Draft Final SA concluded that the draft policy was sustainable and consistent with national policy. It considered that restricting development outside of the built-up areas should help protect open countryside. A potential side-effect of the draft policy was identified as a cumulative effect insofar as restrictions in the countryside could result in development pressures in settlements. It concluded that such pressures would need to be adequately managed through other policies, such as Design Quality, to ensure that development was appropriate for its context and location.

## Assessment

**2.78** Consistency with the Core Strategy is particularly important as the Core Strategy has been adopted and is now part of the Development Plan. The Core Strategy sets out the principles for determining built-up areas in paragraph 5.15 which is to be set out in more detail in the Development Management DPD. To aid clarity the draft policy has been split into Policy S 2 for Built-up Areas and Policy P 7 for Development in the Countryside. The former was then modified to bring it closer in line with the Core Strategy and to clarify how areas within and outside the built-up area would be determined.

**2.79** No change was made in respect of the issue raised on the Draft Proposed Submission policy; the directions of growth do not have definitive boundaries in the same way as allocated development sites so it was not considered appropriate to include them in the policy.

## Proposed Submission Policy

**2.80** Policy S 2 Built-up Areas will support delivery of Core Strategy Objectives 3, 4, 6, 7, 8 and 10 and Policies CS3 The Settlement Hierarchy and CS5 Rural Exceptions Housing.

## Proposals Map

**2.81** Policy S 2 Built-up Areas does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policies:** SS2: Overall Spatial Strategy  
SS4: Towns other than Key Centres and Rural Areas  
ENV3: Biodiversity and Earth Heritage  
ENV7: Quality in the Built Environment

### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	New and upgraded homes and other buildings which are well designed, well maintained and contribute to lower carbon emissions

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Environment	Mitigate and adapt to climate change An environment that is protected and improved

## Heritage Assets

**2.82** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for heritage assets.

### Summary of Consultation

**2.83** The Issues and Options consultation considered Listed Buildings and Conservation Areas and concluded that there was substantial coverage in national policy and it would be difficult to identify specific ways in which this could be applied differently for Huntingdonshire. It therefore did not identify any options for policies.

**2.84** Comments on the Issues and Options were mixed but there was general agreement that policies should reference national guidance and include a presumption in favour of protecting important historic assets whether designated or not. The importance of the historic environment in contributing to the character and quality of the local environment should be acknowledged.

**2.85** Comments on the draft policy were generally supportive, however some issues of concern were identified. In addition to some specific corrections to the supporting text protection of archaeology was raised along with concerns about the relationship with national policy and the prescription for subdivision.

**2.86** Since the Development of Options consultation the Government has issued a draft of PPS15: Planning for the Historic Environment with the view to replacing PPG15 and PPG16. The draft PPS was widely criticised and the Government has indicated that a new draft will be drawn up.

**2.87** Comments from key consultees on the Draft Proposed Submission related to the clarity of the policy and to Heritage Statements and Design and Access Statements.

### Summary of Sustainability Appraisal

**2.88** The matter was not assessed for the Initial SA.

**2.89** The Draft Final SA concluded that the draft policy was sustainable in terms of preserving the character and setting of conservation areas. It noted that the important contribution that open space makes to the setting and character of conservation areas is mentioned within the supporting text. While the SA considered there would be value in including renewable energy in the policy, as there have been issues with listed buildings and conservation areas, this has been superseded by Statutory Instrument 2008 No. 675 which addresses permitted development rights for microgeneration installations.

### Assessment

**2.90** Although there were no issues and options raised in respect of conservation areas, there was discussion on the topic. The discussion noted that PPG15 strongly guides what development is acceptable within conservation areas.

**2.91** The approach taken in Development of Options stated that national policy will form the basis for making decisions on development proposals affecting a conservation area. An alternative approach would be to rely on national policy. Retention of traditional shopfronts is the only local aspect considered sufficiently significant to supplement this as these are of particular importance in contributing to the character and quality of the environment

## 2 Developing the DPD

in Huntingdonshire's Market Towns and larger villages. Most responses on the Historic Parks and Gardens issue sought some protection for them and the draft policy addressed them alongside conservation areas as the issues for consideration are similar.

**2.92** The Council has worked closely with English Heritage in order to draft a revised Heritage Assets policy. The policy now clearly links with the East of England Plan policy ENV6: The Historic Environment and reflects the direction of national policy indicated by the draft PPS. The Council recognises that a new PPS may be published before the plan is submitted or adopted, however the Council does not believe that this will lead to a need make significant change to the policy.

**2.93** The policy was amended to address issues of clarity raised in comments on the Draft Proposed Submission. Additional supporting text was added to address the issue of Heritage Statements and Design and Access Statements.

### Proposed Submission Policy

**2.94** Policy E 4 Heritage Assets will support delivery of Core Strategy Objectives 8 and 10 and Policy CS1 Sustainable Development in Huntingdonshire.

### Proposals Map

**2.95** Policy E 4 Heritage Assets requires conservation areas to be shown on the Proposals Map. Conservation areas are currently shown on the Proposals Map, however since the Local Plan Proposals Map (which is the basis of the current Proposals Map) was published several conservations areas have been amended. Where conservation areas have changed they are identified on maps X.X to X.X in the Proposals Map document.[Query SAMs]

#### Supports the East of England Plan

**Policies:** ENV3: Biodiversity and Earth Heritage  
ENV6: The Historic Environment

#### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Environment	An environment that is protected and improved

## Biodiversity and Protected Habitats and Species

**2.96** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for biodiversity and protected habitats and species.

### Summary of Consultation

**2.97** The Issues and Options consultation identified the need to promote biodiversity within development proposals and the need to minimise harm to sites of importance for biodiversity or geology. It proposed the option to draw up policies that indicate that development proposals should conserve and create biodiversity habitats to help achieve Local Biodiversity Action Plan Targets. It also proposed the option to draw up policies that indicate that development proposals should not harm protected habitats or species.



**2.98** Respondents were positive about the proposed options and the need for new development to contribute to the biodiversity of the locality. A majority of respondents indicated that they thought sufficient emphasis is being given to biodiversity. Observations included reference to the 1APP forms, suggesting that all biodiversity policies should accord with the new requirements of 1APP validation. Working with relevant organisations such as the Wildlife Trust was identified as important. Various comments identified aspects of national policy and good practice that should be included.

**2.99** The draft policy was widely supported. Issues were identified relating to clarity and relationship with national policy.

**2.100** Comments from key consultees on the Draft Proposed Submission related to the clarity of the policy, which also prompted concerns about possible conflicts with national policy. Support for a number of sections of the supporting text were also received.

### Summary of Sustainability Appraisal

**2.101** The Initial Sustainability Appraisal concluded that conserving and enhancing biodiversity proposed will provide protection appropriate for locally important assets and seek positive gain through mitigation and other measures.

**2.102** The draft Final SA concluded that the policy is sustainable and consistent with national guidance as it provides a clear policy of support for maintaining and enhancing biodiversity. It recognises the need to be pragmatic and weigh the benefits of the need for development against the need for conservation of biodiversity through a requirement of appropriate mitigation. The SA did recommend that provision for green infrastructure could be included within the policy and supporting text to better link the policy with proposed Strategic Greenspace Enhancement policy contained in the Submission Core Strategy.

**2.103** Option is consistent with national guidance and is supportive of objectives relating to habitat protection.

**2.104** The draft final SA concluded that the draft policy was consistent with national guidance and provided a basic level of protection for designated sites and those recognised for their conservation value.[Check DFSA]

### Assessment

**2.105** The consultation responses were supportive of the proposed option and no reasonable alternatives have been identified. The protection of biodiversity is a requirement of national and regional guidance. The Council carries out extensive consultation with all key stakeholders and the public, including organisations such as Natural England and the Wildlife Trust and good links have been established to facilitate the development of appropriate policy. The requirements of 1APP forms and local requirements are consistent with the emerging biodiversity policy.

**2.106** The draft policy distinguishes between sites of national or international importance and others and sets criteria for their protection in relation to development proposals. No alternatives were put forward as such protection is required nationally. A local policy is considered to be justified as it sets out the local areas for protection and the scope of remediation work required when development is permitted.

**2.107** The policy was amended to address issues of clarity raised in comments on the Draft Proposed Submission. The amendments also minimise potential conflicts with national policy.

### Proposed Submission Policy

**2.108** Policy E 4 Biodiversity and Protected Habitats and Species will support delivery of Core Strategy Objectives 8 and 16 and Policies CS1 Sustainable Development in Huntingdonshire, CS9 Strategic Green Space Enhancement and CS10 Contributions to Infrastructure Requirements.

# 2 Developing the DPD

## Proposals Map

**2.109** Policy E 4 Biodiversity and Protected Habitats and Species does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policies:** ENV3: Biodiversity and Earth Heritage  
ENV4: Agriculture, Land and Soils

### Supports the Sustainable Community Strategy

**Strategic Themes:**

Environment

**Outcomes:**

An environment that is protected and improved

## Trees, Woodland and Hedgerows

**2.110** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for Trees, Woodland and Hedgerows.

### Summary of Consultation

**2.111** The Issues and Options Consultation identified the need to minimise risk of harm to trees, hedgerows or other environmental features of visual or nature conservation value. It proposed the option to use Tree Preservation Orders for important trees, and to supplement them with policies with criteria to minimise the risk of harm to trees, hedgerow and other environmental features.

**2.112** Respondents were positive towards the proposed option. Criteria proposed included using criteria from PPS9 and the East of England Plan as a basis, the principle of no net loss and that historical integrity, visual impact, sustaining biodiversity, carbon footprint, impact on water table and preserving archaeological sites were all important aspects to cover.

**2.113** Comments on the draft policy were supportive, although other natural and semi-natural features including ridge and furrow and flood meadows were suggested for inclusion in the policy.

**2.114** Comments from key consultees on the Draft Proposed Submission were supportive but raised issues of clarity.

### Summary of Sustainability Appraisal

**2.115** The initial sustainability appraisal supported the option of criteria to minimise the risk of harm to trees, hedgerows and other environmental features.

**2.116** The draft final SA concluded that the draft policy was consistent with national policy and would provide a clear policy statement to ensure that appropriate landscaping was incorporated into development and to protect against the loss of environmental value. It was considered that reference to ancient and veteran trees, hedgerows and woodland would enhance the policy.

## Assessment

**2.117** The proposed option is supported by respondents. The CROW Act has not been referenced as this is enshrined in law. Similarly, the criteria suggested by respondents which are based on national policy have not been repeated as a key aim of the development plan system. Other criteria that have been suggested are covered elsewhere within the LDF and do not need to be repeated in this particular policy.

**2.118** The policy was amended to address issues of clarity raised in comments on the Draft Proposed Submission.

## Proposed Submission Policy

**2.119** Policy E 5 Trees, Woodland and Hedgerows will support delivery of Core Strategy Objectives 8, 14 and 16 and Policies CS1 Sustainable Development in Huntingdonshire and CS9 Strategic Green Space Enhancement.

## Proposals Map

**2.120** Policy E 5 Trees, Woodland and Hedgerows does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policy:** ENV5: Woodlands

### Supports the Sustainable Community Strategy

**Strategic Themes:**

Environment

**Outcomes:**

An environment that is protected and improved

## The Great Fen Project

**2.121** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for the great fen project.

### Summary of Consultation

**2.122** The Issues and Options Consultation did not identify specific issues and options with regard to the Great Fen Project. Responses suggested that more consideration should be given to strategic green infrastructure projects such as the Great Fen Project.

**2.123** [Query anything else about what it was that made us decide to write a policy]

**2.124** The draft policy was widely supported. There were some issues of concern raised including the impact on archaeology and other heritage assets, links to and policy coverage of other significant green infrastructure and promotion of sustainable travel options for visitors.

**2.125** Comments from key consultees on the Draft Proposed Submission were supportive but raised issues relating to archaeology.

# 2 Developing the DPD

## Summary of Sustainability Appraisal

**2.126** The Initial SA did not consider any options with regard to the Great Fen Project.

**2.127** The draft final SA concluded that the draft policy was sustainable and that it complemented the Strategic Green Infrastructure Enhancement policy in the Submission Core Strategy.

## Assessment

**2.128** [Query anything else about what it was that made us decide to write a policy]

**2.129** The policy has been clarified with regards to the landscape and visual setting boundary associated with the Great Fen Project.

**2.130** No changes were made to the policy or supporting text in relation to the issue of archaeology raised in comments on the Draft Proposed Submission; it was considered that policy E 3 sufficiently covered the issue.

## Proposed Submission Policy

**2.131** Policy E 6 The Great Fen Project will support delivery of Core Strategy Objectives 8, 9, 14 and 18 and Policies CS1 Sustainable Development in Huntingdonshire and CS9 Strategic Green Space Enhancement.

## Proposals Map

**2.132** Policy E 6 The Great Fen Project requires designations for The Great Fen Project Area and The Great Fen Landscape and Visual Setting Boundary on the Proposals Map. These designations are identified on map X.X in the Proposals Map document.

### Supports the East of England Plan

**Policies:** ENV1: Green Infrastructure  
ENV2: Landscape Conservation  
ENV3: Biodiversity and Earth Heritage

### Supports the Sustainable Community Strategy

Strategic Themes:	Outcomes:
Health and well-being	Appropriate culture and leisure opportunities
Environment	Mitigate and adapt to climate change An environment that is protected and improved
Economic prosperity and skills	Increased visitor numbers

## Protection of Open Space

**2.133** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for open space and Recreational Land.

### Summary of Consultation

**2.134** The Issues and Options consultation identified the need to protect open space within settlements along with outdoor recreation facilities and allotments. It proposed the option to draw up policies that will protect open space and recreation land.

**2.135** Respondents were generally supportive of the proposed option. It was suggested that the scope was too narrow and it should encompass the principles for habitat creation projects and reference to the Green Infrastructure Strategy should be made.

**2.136** There was support for a criteria based policy rather than identifying and designating all areas of open space on the proposals maps as this would ensure that no important areas of open space were overlooked as could happen when designating and mapping areas. It was also suggested that areas of open space should be designated on a map but, prior to designation, a criteria based approach should be employed to assess the merits, value and use of space to justify its provision.

**2.137** Comments on the draft policy were mixed. Although there was some support issues of clarity were raised.

**2.138** Comments from key consultees on the Draft Proposed Submission related to the clarity of the policy.

### Summary of Sustainability Appraisal

**2.139** The Initial SA concluded that the option is beneficial in terms of protecting the open character of land within and around all settlements, whether for recreation or other uses. However, open space standards as applied within urban areas will contribute to development pressures and need to be mitigated through design proposals, particularly those on housing density. As it would be difficult to identify all areas of open space in a sufficiently exhaustive and consistent manner across the district given Huntingdonshire's size and the variety of spaces involved, the appraisal rates the reasonable alternative - to identify and designate areas on the Proposals Map - as less sustainable as it may result in spaces that are 'missed' in the identification and designation process coming under inappropriate development pressure.

**2.140** The policy is clearly sustainable and consistent with national guidance. The policy complements policies such as design to ensure that a high quality public realm is created.

**2.141** The draft final SA concluded that the draft policy was sustainable and consistent with national guidance. It was noted that the draft policy formed a key component of and was complementary to other policies such as design quality to ensure a high quality public realm was created.[Check DFSA]

### Assessment

**2.142** Alternatives to a criteria based approach are to identify and designate all areas of open space and recreational land individually on the Proposals Map but use a criteria based policy to assess the value and merit of sites. This options has been discounted due to the possibility of overlooking open space when them.

**2.143** The wording of the policy has been amended from the draft[Query how policy was changed from the draft]

**2.144** The policy was amended to address issues of clarity raised in comments on the Draft Proposed Submission.

### Proposed Submission Policy

**2.145** Policy E 7 Protection of Open Space will support delivery of Core Strategy Objectives 8 and 14 and Policies CS1 Sustainable Development in Huntingdonshire and CS9 Strategic Green Space Enhancement.

# 2 Developing the DPD

## Proposals Map

**2.146** Policy E 7 Protection of Open Space does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policy:** ENV1: Green Infrastructure

### Supports the Sustainable Community Strategy

**Strategic Themes:**      **Outcomes:**

Growth and infrastructure	Improved health, education/learning, training, community and leisure infrastructure and local and strategic open space through the appropriate provision of facilities to meet current and future needs
Health and well-being	Appropriate culture and leisure opportunities
Environment	An environment that is protected and improved

## Sustainable Travel

**2.147** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for sustainable travel.

### Summary of Consultation

**2.148** The Issues and Options consultation identified the need to maintain and enhance rights of way and other routes and the need to ensure safe access to the transport network, to prevent unacceptable impacts on the network and to promote sustainable forms of transport. It proposed the options to draw up policies that would require development to maintain and where possible enhance the network of rights of way and other routes, that would set out criteria for assessing proposals and require transport assessments or transport statements.

**2.149** Comments on the draft policy for Sustainable Travel were generally supportive of the principle of the policy. Comments specifically identified ways to improve the draft policy.

**2.150** Comments from key consultees on the Draft Proposed Submission related to the flexibility of the policy and reference to impact on existing and proposed pedestrian and cycle routes.

### Summary of Sustainability Appraisal

**2.151** The Initial SA concluded that the options were sustainable and consistent with policy on green transport and encouraging healthier travel choices. It noted that the district's position on the strategic road network means that the option for transport impacts supports the economic activity component of sustainable development. It also noted that although that option does not deal specifically with the need to manage the modal shift complementary policies on car and cycle parking further encourage this shift.

**2.152** The Draft Final SA concluded that the draft policy was sustainable and in line with national guidance. It was noted that it provided a locally specific policy aimed at encouraging people to travel by sustainable modes and this would help reduce congestion and improve air quality which are issues for the District.

## Assessment

**2.153** The draft policy was centred around maintenance and improvements to the pedestrian and cycle route network. The policy has therefore been amended to widen its scope by dealing with design issues to favour sustainable travel modes, seeking improvements to public transport and links with strategic green infrastructure.

**2.154** No changes were made with regard to issues of flexibility raised in comments on the Draft Proposed Submission; the policy was considered to be sufficiently flexible. A reference to impact on pedestrian and cycle links was added to the supporting text.

## Proposed Submission Policy

**2.155** Policy E 8 Sustainable Travel will support delivery of Core Strategy Objectives 1, 6, and 14 and Policy CS1 Sustainable Development in Huntingdonshire.

## Proposals Map

**2.156** Policy E 8 Sustainable Travel does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policies:** SS2: Overall Spatial Strategy  
T1: Regional Transport Strategy Objectives and Outcomes  
T2: Changing Travel Behaviour  
T4: Urban Transport  
T7: Transport in Rural Areas  
T8: Local Roads  
T9: Walking, Cycling and other Non-Motorised Transport  
T13: Public Transport Accessibility

### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Sustainable patterns of growth and development An upgraded and managed transport network, including public transport to service existing and growing communities effectively and safely
Economic prosperity and skills	An appropriate physical infrastructure to support sustainable growth of the economy

## Travel Planning

**2.157** This policy was drawn up following the Development of Options consultation.

# 2 Developing the DPD

## Summary of Consultation

**2.158** Comments received on the draft policy for sustainable travel and more general comments identified the potential for a policy for Travel Planning as particular issues specific to Huntingdonshire were not addressed by the currently drafted policies.

## Summary of Sustainability Appraisal

**2.159** The policy was not assessed in the Initial or Draft Final SA.

## Assessment

**2.160** Following the assessment of comments received on the draft policy for sustainable travel and more general comments it was considered that there was potential for a policy for Travel Planning as particular issues specific to Huntingdonshire were not addressed by the currently drafted policies and it was considered to be a topic that could stand in its own right as a policy.

## Policy

**2.161** Policy E 9 Travel Planning will support delivery of Core Strategy Objectives 1, 6, and 14 and Policy CS1 Sustainable Development in Huntingdonshire.

## Proposals Map

**2.162** Policy E 9 Travel Planning does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policies:** SS2: Overall Spatial Strategy  
T1: Regional Transport Strategy Objectives and Outcomes  
T2: Changing Travel Behaviour  
T4: Urban Transport  
T7: Transport in Rural Areas  
T8: Local Roads  
T9: Walking, Cycling and other Non-Motorised Transport  
T13: Public Transport Accessibility

### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Sustainable patterns of growth and development An upgraded and managed transport network, including public transport to service existing and growing communities effectively and safely Enhanced market town centres that serve their surrounding area
Environment	Mitigate and adapt to climate change
Inclusive, safe and cohesive communities	Appropriate community transport



<b>Strategic Themes:</b>	<b>Outcomes:</b>
Economic prosperity and skills	An appropriate physical infrastructure to support sustainable growth of the economy

## Parking Provision

**2.163** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for parking provision.

### Summary of Consultation

**2.164** Consultation on Issues and Options identified the need to promote appropriate levels of car parking and to encourage cycling through the provision of bicycle parking. Also identified was the option of drawing up a policies to set out that development proposals should limit car parking and provide cycle parking and disabled parking to levels set out in the Council's parking standards. The majority of respondents who commented were in favour of the option. Other responses were mixed; some felt that provision needed to be sufficiently flexible to recognise the difference between 'town and country' to avoid inappropriate forms of development in rural areas. It was suggested that in areas with poor public transport accessibility the maximum standards should be treated as minimum. It was also suggested that the current Parking Standards are out of date and do not take into account more recent government advice.

**2.165** Comments received on the draft policy for parking provision were generally supportive, although most identified some aspect of the draft policy that could be improved. Improvements identified related to support for car free housing developments, cycle parking requirements and clarification for commercial development.

### Summary of Sustainability Appraisal

**2.166** [Check ISA] The policy is consistent with national guidance. It seeks to reduce the amount of car parking for town centres as it is recognised that these locations are more accessible. Careful monitoring arrangements of this policy will need to be put in place.

**2.167** The draft final SA concluded that as the draft policy proposed car/cycle parking consistent with PPS3 and PPG13 there was limited scope for variation. It noted that as the District is largely rural some residents would be reliant on car transport to access facilities and amenities. It also noted that it would be important to monitor this policy to ensure that it was not counter productive and discourage people visiting eg town centres and shops because of perceived parking constraints.

### Assessment

**2.168** The consultation responses have raised two alternatives to lower maximum parking provision levels to place a greater emphasis on ensuring efficient use of land or to have a more flexible approach to better meet the needs of continuing high car ownership levels

**2.169** The policy approach taken for Issues and Options is in accordance with national guidance and the levels of provision are broadly similar to the current standards. It represents a balance between the competing objectives of promoting more sustainable modes of transport and efficiently using land versus providing for the local circumstances of high car ownership. The maximum car parking provision is more restrictive for dwellings in town centres (with the exception of Ramsey) than for other areas. This recognises that town centres are generally better provided with public transport options and have services and facilities within walking distance.

# 2 Developing the DPD

**2.170** Comments received on the draft policy in the Development of Options document were broadly accepted. Specific changes include references to sources of good practice information, clarification of requirements and footnotes as well as guidance on parking layout. The policy was also reworded to give more clarity to the circumstances where car free or development with limited car parking would be supported. The consistency with neighbouring Cambridgeshire authorities was raised in relation to parking provision. Having reviewed recently adopted and emerging provision requirements for neighbouring Cambridgeshire authorities only very limited differences were found for car parking provision, however cycle parking requirements have been brought more closely in line.

### Proposed Submission Policy

**2.171** Policy E 10 Parking Provision will support delivery of Core Strategy Objectives 1, 6, and 14 and Policy CS1 Sustainable Development in Huntingdonshire.

### Proposals Map

**2.172** Policy E 10 Parking Provision does not require any designations on the Proposals Map.

**Supports the East of England Plan**

**Policies:** T2: Changing travel behaviour  
T8: Local roads  
T14: Parking

**Supports the Sustainable Community Strategy**

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	An upgraded and managed transport network, including public transport to service existing and growing communities effectively and safely Enhanced market town centres that serve their surrounding area
Environment	Mitigate and adapt to climate change
Economic prosperity and skills	An appropriate physical infrastructure to support sustainable growth of the economy

## Delivering Housing

**2.173** Brief details about re-organisation of policies needed with regard to Delivering Housing chapter.

## Efficient Use of Housing Land

**2.174** This policy was drawn up following the Development of Options consultation where it was consulted on as the draft policy for housing density.

### Summary of Consultation

**2.175** The Issues and Options consultation identified the need to ensure the density of development makes efficient use of land. It identified options of a single net density for development purposes to be applied across the district or a range of densities to be applied for development proposals according to settlement type, character and amenities. There was support for criteria specifying a range of densities according to settlement type and character allowing greater flexibility and enabling developments to respond to their local context. There was support for adhering to the nationally advised minimum density of 30dph but some concern that this would require more than 3 dwellings on some sites in smaller settlements possibly raising conformity issues with the Core Strategy. Concern was also raised that Design and Access Statements should clearly state the density chosen and justify that choice.

**2.176** While comments on the draft policy for housing density generally accepted the principle of the policy there were general and specific issues identified with the wording relating to the specific densities identified and flexibility.

### Summary of Sustainability Appraisal

**2.177** The Initial SA considered the set minimum density option not sustainable because applying a standard net density fails to take into account the character and amenities of settlements and will not ensure development at higher densities in more sustainable settlements. The alternative is more sustainable and consistent with the current governmental approach. It is designed to ensure that settlements which are more sustainable have higher densities for development. It also ensures the broadening of the local economy is supported by a mix of accommodation appropriate to a diverse workforce.

**2.178** The Draft Final SA concluded that the draft policy was sustainable and was consistent with national policy. It was noted that the draft policy should facilitate a degree of discretion regarding densities and will enable the Council to encourage higher densities in more sustainable locations.

### Assessment

**2.179** Although the option of drawing up a range of densities was considered to be more flexible and sustainable and this was presented as the draft policy, there is considered to be limited evidence for the ranges identified. The policy therefore sets out the considerations that should inform the density of development. The 30 dwellings per hectare nationally advised minimum density is still expected on any site unless it can otherwise be justified.

**2.180** The policy wording has been changed from the draft by removing the density ranges and identifying the considerations to be applied.

### Proposed Submission Policy

**2.181** Policy H 1 Efficient Use of Housing Land will support delivery of Core Strategy Objectives 1, 2, 3, 10 and 11 and Policies CS1 Sustainable Development in Huntingdonshire, CS3 The Settlement Hierarchy, CS4 Affordable Housing, CS5 Rural Exceptions Housing.

### Proposals Map

**2.182** Policy H 1 Efficient Use of Housing Land does not require any designations on the Proposals Map.

# 2 Developing the DPD

## Supports the East of England Plan

**Policies:** SS2: Overall Spatial Strategy  
H1: Regional Housing Provision 2001 to 2021  
ENV7: Quality in the Built Environment

## Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Sustainable patterns of growth and development Sufficient housing to meet future needs Improved health, education/learning, training, community and leisure infrastructure and local and strategic open space through the appropriate provision of facilities to meet current and future needs New and upgraded homes and other buildings which are well designed, well maintained and contribute to lowering carbon emissions
Environment	Efficient use of resources

## Housing Mix

**2.183** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for housing mix.

### Summary of Consultation

**2.184** The Issues and Options consultation identified the need for housing development to reflect the economic and social needs of the district and promote the creation of sustainable communities. It identified the option of drawing up policies that would require proposals to provide an appropriate mix of housing according to the scale of development.

**2.185** The majority of respondents made observations rather than indicating support or objections. The evidence requiring provision of one and two bed properties was questioned, with one respondent suggesting that the evidence that there is an increased need for smaller household sizes is wrong. The alternative put forward was that developers should be allowed to determine the most appropriate mix based on knowledge of local market conditions as a prescribed mix may lead to difficulties in deliverability and viability. It was also suggested that a significant proportion of new dwellings should be designed to lifetime mobility standards.

**2.186** While comments on the draft policy broadly accepted the principle of the policy, general and specific issues with the draft wording were raised, particularly with regard to flexibility and the detail of evidence available from the Strategic Housing Market Assessment.

**2.187** Comments from key consultees on the Draft Proposed Submission related to the justification and effectiveness of the policy.

## Summary of Sustainability Appraisal

**2.188** The Initial SA considered the option to be sustainable and designed to ensure the broadening of the local economy is supported by a mix of accommodation appropriate to the needs of a diverse workforce. The need for appropriately sized and priced properties for smaller families and key workers is an implicit priority.

**2.189** The Draft Final SA concluded that the draft policy was sustainable as it was designed to ensure a mix of accommodation appropriate to the needs of a diverse range of households.

## Assessment

**2.190** The Issues and Options paper did not identify any reasonable alternatives. However, from the consultation reasonable alternatives were identified as using a prescribed mix, based on the SHMA, or to allowing developers to determine an appropriate mix most suited to current market conditions

**2.191** The responses indicated that providing a mix of housing is an appropriate way of ensuring mixed sustainable communities. However, some respondents criticised the evidence on which the policy is based and suggested that developer knowledge of local market conditions is a better way to ensure an appropriate mix is provided.

**2.192** The Cambridge Sub Region Strategic Housing Market Assessment (SHMA) provides detailed information on the changing demographics for the District. Using population figures and future population forecasts as well as current data on house size and type it provides an indication of the appropriate housing mix. Developers will be required to provide reasoned justification for the housing mix chosen in their Design and Access Statements.

**2.193** The benefits and disadvantages of the two options reflect the issues of need versus demand. In a similar way that the principal of providing affordable housing to address affordability issues is accepted because the housing market does not provide for everyone's needs, national policy accepts that intervention in the mix of housing is justified to better meet housing needs. The policy also helps to ensure that appropriate mixes are provided in order to create sustainable mixed communities. The SMHA has been added to in order to incorporate additional research and analysis to inform policies on housing supply in the sub region. This should mean that housing provision is well matched to the type and size of households seeking accommodation whilst allowing developers to identify the details of what is most appropriate.

**2.194** [Query how the draft policy has been clarified]

**2.195** The policy and supporting text were amended to address issues of justification and effectiveness raised in comments on the Draft Proposed Submission.

## Proposed Submission Policy

**2.196** Policy H 2 Housing Mix will support delivery of Core Strategy Objectives 1, 2, and 3 and Policies CS2 Strategic Housing Development, CS3 The Settlement Hierarchy, CS4 Affordable Housing in Development, CS5 Rural Exceptions Housing, CS6 Gypsies, Travellers and Travelling Showpeople.

## Proposals Map

**2.197** Policy H 2 Housing Mix does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policies:** SS2: Overall Spatial Strategy  
H1: Regional Housing Provision 2001 to 2021  
ENV7: Quality in the Built Environment

# 2 Developing the DPD

## Supports the Sustainable Community Strategy

### Strategic Themes:

Growth and infrastructure

Health and well-being

Environment

Inclusive, safe and cohesive communities

### Outcomes:

Sustainable patterns of growth and development  
Sufficient housing to meet future needs

Increased opportunities for vulnerable people to live independently

Efficient use of resources

Vibrant and cohesive communities

## Adaptability and Accessibility

**2.198** This policy was drawn up following the Development of Options consultation where the policy formed parts of a draft policy for accessibility, adaptability and security.

### Summary of Consultation

**2.199** The Issues and Options consultation identified the need to ensure places are accessible and safe to use for all groups in society. It identified the option of drawing up policies that will set out criteria to ensure proposals are appropriately located, enable easy access and minimise the risk of fear of crime. No responses were received.

**2.200** Comments received on the draft policy were generally supportive. One comment considered the draft policy to be potentially limiting for development that had a genuine need to be located in the countryside.

### Summary of Sustainability Appraisal

**2.201** The Initial SA supported the proposed option as it was considered clearly sustainable. It noted that the policy would need to be worded to show how providing for access is reflected in the design of developments complementing other policies on design and street scene.

**2.202** The Draft Final SA concluded that the draft policy was sustainable and adequately reflected how access needs should be reflected in the design of developments. It was noted that the policy would be complemented by the requirement for Design and Access Statements to accompany most planning applications.

### Assessment

**2.203** No alternatives were raised through the consultation process. Local planning authorities are required to include policies on access, while national guidance indicates that community cohesion and the needs of all groups in society should be addressed. A criteria based approach provides the most appropriate way of indicating how these matters can be considered in the development process.

**2.204** The draft policy was split and the security related elements were incorporated into the amenity policy (H 7).

### Proposed Submission Policy

**2.205** Policy H 3 Adaptability and Accessibility will support delivery of Core Strategy Objectives 3, 5, and 13 and Policy CS1 Sustainable Development in Huntingdonshire.

## Proposals Map

**2.206** Policy H 3 Adaptability and Accessibility does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policy:** SS2: Overall Spatial Strategy

### Supports the Sustainable Community Strategy

**Strategic Themes:**

Health and well-being

Inclusive, safe and cohesive communities

**Outcomes:**

Reduce accidents  
Increased opportunities for vulnerable people to live independently

Vibrant and cohesive communities

## Supported Housing

**2.207** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for housing with care.

### Summary of Consultation

**2.208** The Issues and Options consultation identified issues for Retirement Housing and for Nursing and Care Homes; the need to provide housing to meet the specialist needs of the elderly and the need to provide specialist accommodation and care to people in need. It identified options to draw up policies to set out criteria to assess proposals for specialist retirement housing and to set out criteria to assess proposals for nursing and care homes.

**2.209** There were high levels of recognition that retirement housing should be provided in close proximity to services with good access to services considered the minimum essential by most respondents. Access to good public transport links, health care facilities and a local convenience shop were considered important. Dentists and post offices were identified as desirable.

**2.210** There was support for the principle of allowing nursing and care homes in locations and on a scale that would not normally be permitted for general housing, although there were also objections to this principle. The primary concern related to the need to have appropriate services and infrastructure in place prior to nursing or care homes being built. A recurring issue was the need for services and facilities to be appropriate to the needs of the elderly. In terms of the appropriate types of services, responses were very similar to those made for retirement housing with healthcare being most important followed by public transport.

**2.211** Comments on the draft policy were limited but were generally supportive of the principles. A number of relatively minor wording changes were suggested.

### Summary of Sustainability Appraisal

**2.212** [Check ISA]The Initial SA concluded that the option was sustainable as it promoted the social inclusion of vulnerable groups.

## 2 Developing the DPD

**2.213** The initial SA concluded that the option was sustainable as it meets the needs of a section of the population that may be disadvantaged in terms of health or income encouraging the provision of a supportive and inclusive environment. The only potential concern was that facilities will compete with other land uses for the most accessible sites.

**2.214** The Draft Final SA concluded that the draft policy was sustainable and in line with government guidance on creating mixed and sustainable communities. It meets the needs of sections of the population that may be disadvantaged in terms of health or income, encouraging development at sites that are more accessible and socially inclusive. The only potential concern is that facilities will struggle to compete with other land uses for the most accessible sites. The policy is worded such that accessibility and service provision will clearly be important considerations.

### Assessment

**2.215** Two reasonable alternatives were identified; nursing and care homes could be restricted solely to sites within Market Towns and Key Service Centres to ensure that new homes have adequate public transport access for residents, visitors and staff; and allowing proposals outside the built-up area of settlements where it can be demonstrated that they have a particular requirement for a peaceful environment. The first alternative would not enable appropriate forms of development where a rural location could be beneficial to potential residents. The second approach (advocated by consultees) is less restrictive, however it would be incompatible with national guidance to focus residential development in urban areas.

**2.216** A number of minor wording changes have been made as suggested by consultees and to aid clarity.

### Proposed Submission Policy

**2.217** Policy H 4 Supported Housing will support delivery of Core Strategy Objectives 1 and 3 and Policies CS1 Sustainable Development in Huntingdonshire, CS2 Strategic Housing Development and CS3 The Settlement Hierarchy.

### Proposals Map

**2.218** Policy H 4 Supported Housing does not require any designations on the Proposals Map.

#### Supports the East of England Plan

**Policy:** SS2: Overall Spatial Strategy

#### Supports the Sustainable Community Strategy

**Strategic Themes:**

Health and well-being

Inclusive, safe and cohesive communities

**Outcomes:**

Increased opportunities for vulnerable people to live independently

Vibrant and cohesive communities



## Homes in the Countryside

**2.219** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for homes in the countryside.

### Summary of Consultation

**2.220** The Issues and Options consultation identified the need to restrict the intrusiveness of built development in countryside locations. It identified the option of drawing up policies that limit alterations and extensions that can be made to existing dwellings and restricts replacement dwellings built in the countryside.

**2.221** Of those who indicated a clear preference opinion was split. A particular concern raised related to the evidence base to support the proposed policy and a number of respondents suggested that the option is based on vague presumptions. Other respondents objected to a blanket approach being taken with a specific limit on floor area increase or percentage increase. It was also suggested that more information was needed - specifically in relation to the limitations and restrictions that will be applied.

**2.222** While comments on the draft policy accepted the principle issues were raised with the draft wording relating to the approach to defining the built-up area and consequently the countryside, the relationship with other policies and the need for specific criteria.

### Summary of Sustainability Appraisal

**2.223** [Check ISA] The option to limit alterations and extensions and restrict replacements is clearly sustainable and consistent with current policy.

**2.224** The policy is consistent with national guidance. It is clearly motivated by local conditions and the need to carefully control development in the instances where it is needed. The SA recommended that explicit reference could be made to the use of appropriate materials as emphasised in the Design Guide. The recommendation was however, not considered necessary as all applications will be assessed in terms of design quality which emphasises the need to use the Design Guide. Reference to the Design Guide would be repetitive and complicate the policy unnecessarily.

**2.225** The Draft Final SA concluded that the draft policy was consistent with national guidance designed to prevent unsympathetic rural development. It was noted that the draft policy was motivated by local conditions and the need to carefully control development. It was considered that re-worded the marketing could be beneficial in terms of reducing the time builds were vacant. However, it was acknowledged that the seasonal nature some employment in the District would mean that it would be difficult to ensure efficient marketing occurs.

### Assessment

**2.226** Two alternatives were identified as a result of consultation; significant increases in height and massing could be permitted or development on sites of abandoned dwellings could be permitted. However, these alternatives would not contribute to the aspirations of PPS7 in seeking a sustainable pattern of rural areas, the protection of the intrinsic character of the countryside and to restrict the intrusiveness of development. The alternatives are therefore not considered 'reasonable'.

**2.227** For the draft policy criteria on new dwellings in the countryside and relaxation of occupancy conditions was included. This was considered to facilitate a more holistic policy which clearly sets out the circumstances in which new dwellings may be permitted in the countryside as well as alterations, extensions and changes to occupancy conditions, however it was felt to repeat PPS7 and subsequently deleted.

# 2 Developing the DPD

## Proposed Submission Policy

**2.228** Policy H 5 Homes in the Countryside will support delivery of Core Strategy Objectives 1, 3, 6, 11 and 18 and Policies CS1 Sustainable Development in Huntingdonshire and CS3 The Settlement Hierarchy.

## Proposals Map

**2.229** Policy H 5 Homes in the Countryside does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policies:** SS4: Towns other than Key Centres and Rural Areas  
ENV6: The Historic Environment  
ENV7: Quality in the Built Environment

### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Sustainable patterns of growth and development Sufficient housing to meet future needs New and upgraded homes and other buildings which are well designed, well maintained and contribute to lowering carbon emissions
Environment	An environment that is protected and improved

## Residential Moorings

**2.230** This policy was drawn up following the Development of Options consultation.

### Summary of Consultation

**2.231** General comments on the Development of Options document raised issues relating to the use of moorings for permanent homes.

**2.232** Comments from key consultees on the Draft Proposed Submission related to the clarity of the policy and supporting text.

### Summary of Sustainability Appraisal

**2.233** The policy was not appraised by the Initial or Draft Final SA processes.

### Assessment

**2.234** Following several comments that identified issues relating to water related activities, it was concluded that there was scope for a policy dealing with the permanent residential use of moorings in the district. The policy seeks to limit the residential use of moorings to sustainable locations in a similar way to other residential uses.

Policies relating to housing development generally limit new homes to within the built-up areas of the district. By definition moorings are not part of the built-up area. It is therefore considered appropriate to limit residential moorings to locations immediately adjacent to built-up areas.

**2.235** The policy and supporting text were amended to address issues of clarity raised in comments on the Draft Proposed Submission.

### Proposed Submission Policy

**2.236** Policy H 6 Residential Moorings will support delivery of Core Strategy Objectives 1 and 3 and Policy CS3 The Settlement Hierarchy.

### Proposals Map

**2.237** Policy H 6 Residential Moorings does not require any designations on the Proposals Map.

#### Supports the East of England Plan

**Policies:** SS4: Towns other than Key Centres and Rural Areas  
ENV7: Quality in the Built Environment

#### Supports the Sustainable Community Strategy

Strategic Themes:	Outcomes:
Growth and infrastructure	Sustainable patterns of growth and development
Health and well-being	Appropriate culture and leisure opportunities
Environment	An environment that is protected and improved

## Amenity

**2.238** This policy was drawn up following the Development of Options consultation where the policy formed parts of the draft policy for accessibility, adaptability and security and the draft policy for amenity.

### Summary of Consultation

**2.239** The Issues and Options Consultation identified the need to protect the amenity of existing and future occupiers. It identified the option to draw up policies so that development proposals should not have an unreasonable impact on living conditions for existing or future occupiers in terms of access to daylight and sunlight, privacy, noise and disturbance, fumes and other pollutants and safety and security. No comments were received.

**2.240** Comments on the draft policy for Accessibility, Adaptability and Security were generally supportive. One comment considered the draft policy to be potentially limiting for development that had a genuine need to be located in the countryside. Comments received on the draft policy for Amenity were supportive. Comments identified potential problems with interpretation of terms used and sought more detail.

# 2 Developing the DPD

## Summary of Sustainability Appraisal

**2.241** [Check ISA]The initial SA supported the option as such a policy would preserve elements of the status quo without harming the local economy in such a way as to deter development.

**2.242** The Draft Final SA concluded that the draft policy for amenity was designed to protect public interest by preventing harm to people and places potentially affected by development, addressed a number of issues which impact upon quality of life and was inherently sustainable. It also noted that the draft policy addressed social aspects of sustainable development as well as the environmental aspects and that it was not within the remit of the policy to consider economic issues. It concluded that the draft policy for accessibility, adaptability and security was sustainable and adequately reflected how access needs should be reflected in the design of developments. It was noted that the policy would be complemented by the requirement for Design and Access Statements to accompany most planning applications.

## Assessment

**2.243** No alternatives have been identified as a result of consultation. The need to protect amenity of existing and future occupiers is an important issue that warrants a policy. It is not covered adequately by national guidance and so a local policy is justified.

**2.244** Following assessment of consultation response it was decided to separate security from accessibility and adaptability as it was considered that it would fit better with amenity.

## Policy

**2.245** Policy H 7 Amenity will support delivery of Core Strategy Objectives 8, 10, and 11 and Policy CS1 Sustainable Development in Huntingdonshire.

## Proposals Map

**2.246** Policy H 7 Amenity does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policy:** ENV7: Quality in the Built Environment

### Supports the Sustainable Community Strategy

**Strategic Themes:**

Health and well-being

Environment

Inclusive, safe and cohesive communities

**Outcomes:**

Reduced health inequalities

An environment that is protected and improved

Reduced crime

Reduced fear of crime

## Supporting Prosperous Communities

**2.247** Brief details about re-organisation of policies needed with regard to Supporting Prosperous Communities chapter.

## Large Scale Businesses

**2.248** This policy was drawn up following the Development of Options consultation where it was consulted on as part of the draft policy for office development and the draft policy for industrial and warehouse development.

### Summary of Consultation

**2.249** The Issues and Options consultation identified the need to ensure office development is located to reduce the need to travel by private car. The need to ensure industrial and warehouse development takes place in appropriate locations was also identified. It identified the option to draw up policies setting out a sequential test for large office developments, smaller office developments would not be subject to such a test. It also identified the option to draw up policies that set out locations for large scale industrial and warehouse development in sustainable locations, and would allow small scale industrial and warehouse development in a wider range of locations.

**2.250** Responses were evenly split between those preferring the lower threshold of 0.5ha or 500m<sup>2</sup> and those preferring the threshold of 1ha or 1000m<sup>2</sup> (in line with DCLG major development definition). However, recurrent concerns that were raised included the need for all development to be located so as to reduce the need to travel and to protect the rural character of the District.

**2.251** Comments on the draft policies were mixed with a number raising issues that were addressed through the examination of the Core Strategy. While there was some support specific and general issues were raised including location, terminology, scale of development and traffic impacts.

**2.252** Comments from key consultees on the Draft Proposed Submission related to the clarity of the policy with particular regard to expansion of existing businesses in countryside locations.

### Summary of Sustainability Appraisal

**2.253** The policy is consistent with national guidance and with the settlement hierarchy proposed in the emerging Core Strategy.

**2.254** The Draft Final SA concluded that the draft policy for office development was sustainable and supportive of other policies designed to reinforce the settlement hierarchy in the emerging Core Strategy and it is consistent with government guidance. It concluded that the draft policy for industrial and warehouse development was sustainable in that it adopted a locational approach for industrial developments that was consistent with other policies for locating housing, retail, amenities etc. Potential problems were identified in that the nature of businesses being attracted was uncertain could entail high levels of water consumption for operations unless it could be demonstrated that these needs can be met in a sustainable way. It was considered that the draft policies sustainability could be improved if industrial development was required to locate at sites well served by the existing sustainable transport modes. This concern has contributed to the decision to include policy S8 Travel Planning in the Proposed Submission DPD.

### Assessment

**2.255** [Check consistency with similar policies re threshold]The Preferred Approach is for office developments of more than 500m<sup>2</sup> or on sites of more than 0.5ha to be located in town centres whenever possible. The higher threshold has not be chosen as, when set in the Huntingdonshire context, this would limit the use of the policy to very few proposals. The policy does not seek to focus development in St Neots and Huntingdon as there will be

## 2 Developing the DPD

significant allocations in these areas as a result of the LDF process. The Preferred Approach is intended to address proposals on unallocated sites and allows for office developments in the town centres of St Ives and Ramsey as well as Huntingdon and St Neots. It is intended that this policy will help counter out-commuting.

**2.256** The draft policies have been substantially amended to deal with large commercial development and smaller scale development rather than office development and industrial and Warehouse development. The national definition of major development has been used as the threshold as it was concluded that the supporting evidence was limited.

**2.257** No changes were made with regard to issues of clarity raised in comments on the Draft Proposed Submission as the policy was considered to give sufficient opportunity for sustainable development. Changes to the policy were made to address consistency with policy P 2 Small Businesses.

### Proposed Submission Policy

**2.258** Policy P 1 Large Scale Businesses will support delivery of Core Strategy Objectives 1, 4, 6, 15 and 17 and Policy CS7 Employment Land.

### Proposals Map

**2.259** Policy P 1 Large Scale Businesses requires designations for Established Employment Areas and Town Centres on the Proposals Map. These designations are identified on maps X.X to X.X in the Proposals Map document.

#### Supports the East of England Plan

**Policies:** E2: Provision of Land for Employment  
CSR1: Strategy for the Sub-Region  
CSR2: Employment Generating Development  
PB1: Peterborough Key Centre for Development and Change

#### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Sustainable patterns of growth and development Appropriate business infrastructure to support sustainable growth of the economy and reduce out-commuting Enhanced market town centres that serve their surrounding area
Economic prosperity and skills	A comprehensive level of business support An appropriate physical infrastructure to support growth of the economy Vibrant town centres Well developed key growth sectors

### Small Businesses

**2.260** This policy was drawn up following the Development of Options consultation where it was consulted on as part of the draft policy for office development and the draft policy for industrial and warehouse development.

## Summary of Consultation

**2.261** The Issues and Options consultation identified the need to ensure office development is located to reduce the need to travel by private car. The need to ensure industrial and warehouse development takes place in appropriate locations was also identified. It identified the option to draw up policies setting out a sequential test for large office developments, smaller office developments would not be subject to such a test. It also identified the option to draw up policies that set out locations for large scale industrial and warehouse development in sustainable locations, and would allow small scale industrial and warehouse development in a wider range of locations.

**2.262** Responses were evenly split between those preferring the lower threshold of 0.5ha or 500m<sup>2</sup> and those preferring the threshold of 1ha or 1000m<sup>2</sup> (in line with DCLG major development definition). However, recurrent concerns that were raised included the need for all development to be located so as to reduce the need to travel and to protect the rural character of the District.

**2.263** Comments on the draft policies were mixed with a number raising issues that were addressed through the examination of the Core Strategy. While there was some support specific and general issues were raised including location, terminology, scale of development and traffic impacts.

**2.264** Comments from key consultees on the Draft Proposed Submission related to the clarity of the policy with particular regard to expansion of existing businesses in countryside locations.

## Summary of Sustainability Appraisal

**2.265** This is a sustainable policy that adopts a locational approach to industrial development which is consistent with policies in the emerging Core Strategy on locating retail and employment etc. The SA recommended that the policy wording could further emphasise the reducing the need to travel, although this is mentioned in the supporting text. It also suggested that type of uses (not industrial) that the Council would prefer could be set out either within the policy wording or the supporting text. It also recommended on providing more detail in the type of use was accepted and the supporting text to the chapter amended accordingly using information provided by the Local Economy Strategy.

**2.266** The Draft Final SA concluded that the draft policy for office development was sustainable and supportive of other policies designed to reinforce the settlement hierarchy in the emerging Core Strategy and it is consistent with government guidance. It concluded that the draft policy for industrial and warehouse development was sustainable in that it adopted a locational approach for industrial developments that was consistent with other policies for locating housing, retail, amenities etc. Potential problems were identified in that the nature of businesses being attracted was uncertain could entail high levels of water consumption for operations unless it could be demonstrated that these needs can be met in a sustainable way.

## Assessment

**2.267** The approach taken with the policies for employment development require large developments to be within safeguarded employment areas or the built-up area of Market Towns or Key Service Centres. The small businesses policy is less restrictive for smaller developments. Alternative approaches have been put forward that the policies should be more restrictive but given the competition from housing proposals for available sites this could increase the difficulty of making employment proposals a viable alternative and potentially have a detrimental impact on delivering employment opportunities. It was considered that the draft policies sustainability could be improved if industrial development was required to locate at sites well served by existing sustainable transport modes. This concern has contributed to the decision to include policies E 8 Travel Planning and D 2 Transport Contributions in the Proposed Submission DPD.

**2.268** No changes were made with regard to issues of clarity raised in comments on the Draft Proposed Submission as the policy was considered to give sufficient opportunity for sustainable development.

# 2 Developing the DPD

## Proposed Submission Policy

**2.269** Policy P 2 Small Businesses will support delivery of Core Strategy Objectives 1, 4, 6, 15 and 17 and Policies CS1 Sustainable Development in Huntingdonshire and CS7 Employment Land.

## Proposals Map

**2.270** Policy P 2 Small Businesses requires designations for Established Employment Areas on the Proposals Map. These designations are identified on maps X.X to X.X in the Proposals Map document.

### Supports the East of England Plan

**Policies:** E2: Provision of Land for Employment  
CSR1: Strategy for the Sub-Region  
CSR2: Employment Generating Development  
PB1: Peterborough Key Centre for Development and Change

### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Sustainable patterns of growth and development Appropriate business infrastructure to support sustainable growth of the economy and reduce out-commuting Enhanced market town centres that serve their surrounding area
Economic prosperity and skills	A comprehensive level of business support An appropriate physical infrastructure to support growth of the economy Vibrant town centres Well developed key growth sectors

## Safeguarding Employment Areas

**2.271** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for redevelopment of commercial sites.

### Summary of Consultation

**2.272** The Issues and Options consultation identified the need to ensure employment sites are not lost prematurely. It identified the option to draw up policies that would set out criteria to ensure development proposals do not result in the premature loss of employment sites.

**2.273** Most respondents supported the principle of a policy to protect employment land although concerns were expressed that any policy should be sufficiently flexible to respond to market demands, not preclude mixed use developments of long term redundant employment sites and focus upon the retention of job opportunities.



**2.274** Comments on the draft policy were mixed with a number raising issues that were addressed through the examination of the Core Strategy. While the principle of the policy was generally accepted specific and general issues were raised including location, terminology, scale of development, application of use classes and traffic impacts.

**2.275** Comments from key consultees on the Draft Proposed Submission related to queries with terminology used and with the flexibility of the policy.

### Summary of Sustainability Appraisal

**2.276** [Check ISA] The suggested option supports continued provision of a stock of brownfield land for business development in appropriate locations. It is broad and covers a range of land uses, taking in office developments that may generate large levels of commuter traffic but minimal goods movement, through to industrial sites where the traffic balance is reversed. It supports the retention of local employment opportunities.

**2.277** The policy supports the continued provision of a stock of brownfield land for business development in appropriate locations and covers a range of uses.

**2.278** The Draft Final SA concluded that the draft policy has a number of strengths including contribution to a flexible planning approach. It was noted that it supports the continued provision of a stock of brownfield land for business development in appropriate locations and covers a range of uses, taking in office developments that may generate large levels of commuter traffic but minimal goods movement to industrial uses where traffic balance is reversed.

### Assessment

**2.279** No threshold has been set as it is considered appropriate to consider all proposals for redeveloping a site current in, or most recently in, employment use in accordance with this policy. The preferred option responds to the results of consultation by being flexible in relation to the market demand and referring to mixed use. The alternative of no restrictions on the re-use of industrial and commercial land for other purposes allowing the highest value use to prevail has been discounted. This could be harmful to employment opportunities and local firms, particularly in urban areas where redevelopment for residential uses might allow for realisation of short-term profits. It could also increase the pressure for employment development on greenfield sites elsewhere and increase the need to travel for work.

**2.280** No changes were made with regard to terminology or flexibility as it was considered that the terminology was sufficiently clear and that the policy, in combination with policy P 4 and national policy, was sufficiently flexible.

### Proposed Submission Policy

**2.281** Policy P 3 Safeguarding Employment Areas will support delivery of Core Strategy Objectives 1, 4, 6, 15 and 17 and Policy CS7 Employment Land.

### Proposals Map

**2.282** Policy P 3 Safeguarding Employment Areas requires designations for Established Employment Areas on the Proposals Map. These designations are identified on maps X.X to X.X in the Proposals Map document.

#### Supports the East of England Plan

**Policy:** E2: Provision of land for employment

# 2 Developing the DPD

## Supports the Sustainable Community Strategy

### Strategic Themes:

Growth and infrastructure

Economic prosperity and skills

### Outcomes:

Sustainable patterns of growth and development  
Appropriate business infrastructure to support sustainable growth of the economy and reduce out-commuting  
Enhanced market town centres that serve their surrounding area

A comprehensive level of business support  
An appropriate physical infrastructure to support growth of the economy  
Vibrant town centres  
Well developed key growth sectors

## Town Centres Uses and Retail Designations

**2.283** This policy was drawn up following the Development of Options consultation where it was consulted on as parts of the draft policy for retail and leisure development and the draft policy for town centres and retail designations.

### Summary of Consultation

**2.284** The Issues and Options consultation identified the need to maintain the vitality and viability of town centres and the need to retain retail uses within primary shopping areas. It identified the option to draw up criteria based policies to set out a sequential approach to the location of major and minor retail and leisure development and to maximise accessibility by walking, cycling and public transport. It also identified the option to draw up policies to define town centres, primary shopping areas and primary shopping frontages and to limit the percentage of non-retail uses within primary shopping frontages with the alternative of not designating primary shopping frontages.

**2.285** There was one expression of support for retaining the focus on town centres. One representation concerned leisure seeking an exception to any sequential approach to be made for Huntingdon Racecourse. The need for a local policy to supplement national guidance was questioned. Respondents overall supported the identification of primary frontages and limitations on non-retail development within these but sought recognition of commercial considerations. It was also suggested that the policies should strengthen the retail offer in town centres with non-retail uses supporting the vitality and viability.

**2.286** Although comments on the draft policy for retail and leisure development generally accepted the principle of the policy, general and specific issues with the draft wording were identified. Issues identified included the proposed limits on retail development in key service centres and identified locations for development, the approach to the location of tourist accommodation and consistency with national policy. Comments on the draft policy for town centres and retail designations were supportive, however proposals to amend the boundary of Huntingdon town centre to include land to the west received a mixed response.

**2.287** Comments from key consultees on the Draft Proposed Submission related to the flexibility of the policy with particular reference to retail development outside town centres.

### Summary of Sustainability Appraisal

**2.288** [Check ISA and DFSA] The Initial SA concluded that the option for Town centres, primary shopping areas and primary frontages is sustainable and consistent with current policy. It concluded that designating town centres and primary shopping frontages would promote the vitality and viability of town centres as it would provide a well

defined heart to the town and would facilitate sustainable travel options. It noted that the explicit consideration given to the need for complementary non-retail outlets within town centres is important in order to maintain the diversity of towns and reinforce the day time and night time economies. It was noted that, although the reasonable alternative potentially gives greater scope for non retail outlets, this could be detrimental to town centre vitality. It concluded that the option for the location of retail and leisure development is consistent with national guidance

**2.289** The Draft Final SA concluded that the draft policy was supportive and consistent with the settlement hierarchy and retail policy proposed within the Submission Core Strategy.

**2.290** The draft final SA concluded that the draft policy for retail and leisure development supportive and consistent with the settlement and housing hierarchies proposed within the (at that time) emerging Core Strategy. It concluded that the draft policy for town centres and retail designations was consistent with government guidance and with the settlement hierarchy proposed in the Core Strategy. It noted that central retailing areas provide the scope for convenience and comparison shopping, encouraging retailers to compete and thereby benefiting local residents while also providing market centres with a well defined heart. It also noted that care would be needed to ensure that complementary activities are permitted to encourage the night time economy.

### Assessment

**2.291** The alternatives identified in the Issues and Options document of not designating primary shopping frontages was discounted as these designations are required by national and regional policy.

**2.292** It is considered necessary to include a policy in the DPD to supplement national policy because of the potential for out of town centre retail and leisure to have a significantly detrimental effect on the existing town centres. The continued vitality of the District's town centres is a key issue. Existing facilities such as Huntingdon Racecourse will be considered not only in relation to this policy, but also others and the site's own planning history.

**2.293** In drawing up the Town Centre boundaries the Council is aware that there is no consensus from those who commented on defining Huntingdon town centre to including land to the west of the ring road, in the George Street/ Ermine Street area. The Council has considered the comments and has decided to leave defining an additional area until production of the Planning Proposals DPD. This area corresponds to the areas for town centre uses identified in the Huntingdon West Area Action Plan. The proposed additions to the St Neots town centre have also been included.

**2.294** The draft policies recognised that non-retail uses appropriately located within primary shopping frontages would be beneficial where there were limits to ensure that these do not come to dominate.

**2.295** For the final version the parts of the draft policy for retail and leisure development that dealt with designations were combined with the draft policy for town centres and retail designations in order to help clarify the Council's approach to retail designations.

**2.296** During the final drafting of the Proposed Submission the Government issued the final version of PPS4: Planning for Sustainable Economic Growth. The policy has been amended to take into account the changes in national policy contained in PPS4.

**2.297** No changes were made with regard to flexibility as it was considered that the policy, in combination with national policy, was sufficiently flexible.

### Proposed Submission Policy

**2.298** Policy P 4 Town Centre Uses and Retail Designations will support delivery of Core Strategy Objectives 1, 4 and 5 and Policies CS1 Sustainable Development in Huntingdonshire, CS3 The Settlement Hierarchy, CS7 Employment Land and CS8 Land for Retail Development.

# 2 Developing the DPD

## Proposals Map

**2.299** Policy P 4 Town Centre Uses and Retail Designations requires designations for Towns Centres, Primary Frontages and Primary Shopping Areas on the Proposals Map. These designations are identified on maps X.X to X.X in the Proposals Map document.

### Supports the East of England Plan

**Policies:** SS4: Towns other than Key Centres and Rural Areas  
SS6: City and Town Centres  
E5: Regional Structure of Town Centres  
C1: Cultural Development

### Supports the Sustainable Community Strategy

Strategic Themes:	Outcomes:
Growth and infrastructure	Sustainable patterns of growth and development Enhanced market town centres that serve their surrounding area
Health and well-being	Appropriate culture and leisure opportunities
Environment	Mitigate and adapt to climate change
Inclusive, safe and cohesive communities	Accessible services for all
Economic prosperity and skills	A comprehensive level of business support An appropriate physical infrastructure to support sustainable growth of the economy Vibrant town centres Increased visitor numbers

## Local Shopping and Services

**2.300** This policy was drawn up following the Development of Options consultation where it was consulted on as part of the draft policy for retail and leisure developments.

### Summary of Consultation

**2.301** The Issues and Options consultation identified the need to maintain the vitality and viability of town centres. It identified the option to draw up criteria based policy to set out a sequential approach to the location of retail and leisure development and to maximise accessibility by walking, cycling and public transport.

**2.302** There was one expression of support for retaining the focus on town centres. One representation concerned leisure seeking an exception to any sequential approach to be made for Huntingdon Racecourse. The need for a local policy to supplement national guidance was questioned. No reasonable alternatives were identified in the Issues and Options document.

**2.303** Comments on the draft policy were mixed; although there was support there was concern that the policy would be ineffective without support from economic measures.

## Summary of Sustainability Appraisal

**2.304** The Initial SA concluded that the option was sustainable and consistent with national policy.

**2.305** The Draft Final SA concluded that the draft policy was supportive and consistent with the settlement hierarchy and retail policy proposed within the Submission Core Strategy.

## Assessment

**2.306** The policy is formed from the parts of the draft policy for retail and leisure development that dealt with local shopping facilities and small scale town centre uses that could be acceptable in built-up areas outside town centres.

**2.307** During the final drafting of the Proposed Submission the Government issued the final version of PPS4: Planning for Sustainable Economic Growth. The policy has been amended to take into account the changes in national policy contained in PPS4.

## Proposed Submission Policy

**2.308** Policy P 6 Local Shopping and Services will support delivery of Core Strategy Objectives 1, 5 and 7 and Policies CS1 Sustainable Development in Huntingdonshire.

## Proposals Map

**2.309** Policy P 6 Local Shopping and Facilities does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policy:** SS4: Towns other than key centres and rural areas

### Supports the Sustainable Community Strategy

#### Strategic Themes:

Growth and infrastructure

Health and well-being

Environment

Inclusive, safe and cohesive communities

Economic prosperity and skills

#### Outcomes:

Sustainable patterns of growth and development  
Enhanced market town centres that serve their surrounding area

Appropriate culture and leisure opportunities

Mitigate and adapt to climate change

Accessible services for all

A comprehensive level of business support  
An appropriate physical infrastructure to support sustainable growth of the economy  
Vibrant town centres  
Increased visitor numbers

# 2 Developing the DPD

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

## Protecting Local Services and Facilities

**2.310** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for key local services and facilities.

### Summary of Consultation

**2.311** The Issues and Options consultation identified the need to prevent the loss of local services and facilities in villages and Key Service Centres. It identified the option to draw up policies that will require development proposals which result in the loss of a last remaining key facility to demonstrate it is no longer needed.

**2.312** All respondents were supportive of retaining, and preferably enhancing, facilities in villages. There was some recognition of changing patterns of use and accessibility of competition making concentration in key locations most likely to ensure the maintenance of high standards of provision for the majority of the population.

**2.313** Comments on the draft policy were mixed; although there was support there was concern that the policy would be ineffective without support from economic measures.

### Summary of Sustainability Appraisal

**2.314** [Check ISA and DFSA] The option is sustainable and designed to prevent any continuation of rural decline that has occurred. Retaining services is essential to maintaining the character of the district. The option does not preclude the closure of the last remaining amenity where there is no longer local support or custom but aims to prevent enforced changes of use where the amenity is still valued by the community.

**2.315** The policy is consistent with national guidance. It is designed to prevent the steady depletion of rural services and facilities which are essential to the character and fabric of the settlement. It does not preclude development where these services and facilities are no longer viable or there is no support but it aims to prevent enforced changes of use on services and facilities that are still valued by the community but where the owner wishes to redevelop the site.

**2.316** The draft final SA concluded that the draft policy was consistent with government guidance and designed to prevent the depletion of rural amenity which is essential to the character and fabric of settlements. It was noted that it is also important to have smaller local concentrations of services and facilities within the suburbs of the larger towns, and the loss of these services and facilities would be damaging to community cohesion, while also increasing the number and lengths of trips made by residents.

### Assessment

**2.317** National guidance PPS4: Planning for Sustainable Economic Growth requires local planning authorities to have policies for supporting the retention of key village facilities. It was considered appropriate to extend this approach to cover the loss of any facility of this type in a village or Key Service Centre regardless of whether it is the last remaining. The emphasis should be on maintaining a reasonable level of facilities as much as protecting individual services.

**2.318** The policy has also been clarified through the inclusion of the uses that are considered to be important to maintain.

### Proposed Submission Policy

**2.319** Policy P 6 Protecting Local Services and Facilities will support delivery of Core Strategy Objectives 1, 5 and 7 and Policies CS1 Sustainable Development in Huntingdonshire and CS3 The Settlement Hierarchy.

## Proposals Map

**2.320** Policy P 6 Protecting Local Services and Facilities does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policy:** SS4: Towns other than Key Centres and Rural Areas

### Supports the Sustainable Community Strategy

#### Strategic Themes:

Growth and infrastructure

Health and well-being

Environment

Inclusive, safe and cohesive communities

Economic prosperity and skills

#### Outcomes:

Sustainable patterns of growth and development  
Enhanced market town centres that serve their surrounding area

Appropriate culture and leisure opportunities

Mitigate and adapt to climate change

Accessible services for all

A comprehensive level of business support  
An appropriate physical infrastructure to support sustainable growth of the economy  
Vibrant town centres  
Increased visitor numbers

## Development in the Countryside

**2.321** This policy was drawn up for the Development of Options consultation where it was consulted on as part of the draft policy for development in the countryside.

### Summary of Consultation

**2.322** The Issues and Options consultation identified the need to conserve the character of the countryside. It identified the option to draw up policies to set out criteria to restrict development outside settlements.

**2.323** There was a mixed response with a number of concerns expressed. A particular concern was that the use of a criteria based policy defining 'the built up area' would be open to interpretation and would be subjective whereas settlement boundaries defined on maps provide certainty and clarity. Alternatives suggested included having a mix of settlement boundaries for Market Towns and Key Service Centres and using a criteria approach for Smaller Settlements or vice versa.

**2.324** Respondents were keen to ensure that there was scope for some development in the countryside to accommodate necessary tourism and visitor facilities and to allow only essential development for agriculture or countryside recreation.

# 2 Developing the DPD

**2.325** Comments on the draft policy concentrated on the approach to the built-up area that now forms policy S2. However relevant comments gave support to the range of uses and circumstances identified where development would be considered favourably. Issues of concern were identified with the potential for conflict between this policy and others, the approach to employment development on the edge of settlements, and the identification of specific individual sites where operational development would be considered favourably.

**2.326** Comments from key consultees on the Draft Proposed Submission related to the clarity of the policy.

### Summary of Sustainability Appraisal

**2.327** The Initial SA concluded that the option was sustainable and consistent with current policy but noted that there is a cumulative effect as restrictions on development in the countryside may give rise to development pressures within settlements. It recommended that careful wording of the policy will be required to ensure the specific circumstances in which development will be permitted in the countryside are clear.

**2.328** The Draft Final SA concluded that the draft policy was sustainable and consistent with national policy. It considered that restricting development outside of the built-up areas should help protect open countryside. A potential side-effect of the draft policy was identified as a cumulative effect insofar as restrictions in the countryside could result in development pressures in settlements. It concluded that such pressures would need to be adequately managed through other policies, such as E 1 Development Context, to ensure that development was appropriate for its context and location.

### Assessment

**2.329** To aid clarity the draft policy has been split into Policy E 2 Built-up Areas and Policy P 7 for Development in the Countryside. The policy has been worded to provide for limited forms of tourism development as well as other development which is accepted as appropriate in the countryside.

**2.330** No changes were made with regard to issues of clarity raised in comments on the Draft Proposed Submission as criterion 'e' of the policy was considered to cover the specific issue raised.

### Proposed Submission Policy

**2.331** Policy P 7 Development in the Countryside will support delivery of Core Strategy Objectives 3, 4, 6, 7, 8 and 10 and Policies CS2 Strategic Housing Development and CS3 The Settlement Hierarchy.

### Proposals Map

**2.332** Policy P 7 Development in the Countryside does not require any designations on the Proposals Map.

#### Supports the East of England Plan

**Policies:** SS4: Towns other than Key Centres and Rural Areas  
ENV4: Agriculture, Land and Soils  
ENV6: The Historic Environment

#### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Sustainable patterns of growth and development



Strategic Themes:	Outcomes:
Health and well-being	Appropriate culture and leisure opportunities
Environment	Mitigate and adapt to climate change Efficient use of resources An environment that is protected and improved

## Rural Buildings

**2.333** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for rural buildings.

### Summary of Consultation

**2.334** The Issues and Options consultation identified the need to ensure that re-use and redevelopment of rural buildings is appropriate for the building itself and the area in which it lies. It identified the option to draw up policies to establish the preference for the re-use and redevelopment of rural buildings for business purposes and to set out criteria against which proposals will be assessed.

**2.335** There was a range of observations. It was suggested that there should be scope for residential conversions in situations where business or tourism use would not be compatible with the principles of sustainable development, in particular in terms of traffic generation or in remote locations. An alternative approach was suggested of setting a floorspace threshold whereby buildings of a certain size would not be considered appropriate for business use and could be converted to residential use without the need to demonstrate the lack of commercial interest.

**2.336** Although comments on the draft policy accepted the principle general and specific issues were identified with the particular wording. Concerns identified included the use and clarity of terminology and the relationship with national policy.

**2.337** Comments from key consultees on the Draft Proposed Submission related to the issue of biodiversity in rural buildings.

### Summary of Sustainability Appraisal

**2.338** The Initial SA concluded that the option is sustainable; redevelopment inevitably creates impacts and can increase traffic in the countryside, therefore it must be sensitive to local character if proposals for farm and rural diversification are to be pursued. If re-development for housing is considered appropriate priority should be given to affordable housing.

**2.339** The Draft Final SA concluded that the draft policy is sustainable and provides a locally specific way to safeguard historic buildings and make the most of use of opportunities to reuse rural buildings in the most sensitive and appropriate way. The draft policy facilitates rural employment opportunities and helps to reduce crime and anti-social behaviour in rural locations.

### Assessment

**2.340** An alternative approach was suggested through the Issues and Options consultation of setting a floorspace threshold whereby buildings of a certain size would not be considered appropriate for business use and allowing conversion to residential use without the need to demonstrate lack of commercial interest. This would potentially increase the amount of residential development in the countryside. It is likely to restrict the supply of premises available for business use which would have detrimental impacts on the rural economy. Such an approach would also be at odds with national policy that business reuse is to be considered the most preferable reuse.

## 2 Developing the DPD

**2.341** The policy responds positively to representations seeking residential conversion where business or tourism use would generate excessive traffic and therefore conflict with the principles of sustainable development. The policy has been changed from the draft to simplify the criteria used by including clearer general criteria for support of reuse proposals and clearer specific criteria for both employment and residential reuse. Considerations for redevelopment have also been clarified.

**2.342** No changes were made with regard to issues of biodiversity in rural buildings raised in comments on the Draft Proposed Submission as it was considered that policy E 4 sufficiently addressed the issue. However, changes were made to the supporting text of policy E 4 to highlight the issue.

### Proposed Submission Policy

**2.343** Policy P 8 Rural Buildings will support delivery of Core Strategy Objectives 3, 4, 6, 7 and 8 and Policies CS1 Sustainable Development in Huntingdonshire, CS3 The Settlement Hierarchy and CS7 Employment Land.

### Proposals Map

**2.344** Policy P 8 Rural Buildings does not require any designations on the Proposals Map.

#### Supports the East of England Plan

**Policies:** SS4: Towns other than Key Centres and Rural Areas  
ENV6: The Historic Environment

#### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Sustainable patterns of growth and development
Environment	Efficient use of resources An environment that is protected and improved
Economic prosperity and skills	A comprehensive level of business support Well developed key growth sectors

## Farm Diversification

**2.345** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for farm diversification.

### Summary of Consultation

**2.346** The Issues and Options consultation identified the need to facilitate the appropriate diversification of farm-based operations to support agricultural businesses and sustain the rural economy. It identified the option to draw up a criteria based policy to set out the circumstances in which developments forming part of a rural diversification scheme would be allowed including the criteria which need to be met if the proposed development is on previously developed land.

**2.347** Almost all respondents considered that a supportive approach should be taken to farm diversification. The quality of the proposed scheme and protection of the farm's viability were considered to be more important than the size of the development required to facilitate it provided there is not excessive encroachment into the countryside.

**2.348** Comments on the draft policy were generally supportive. Concern was expressed about terminology used and issues dealt with by other policies.

### Summary of Sustainability Appraisal

**2.349** The option is clearly sustainable and promotes the rural economy and creation of a diverse workforce. It is, however, necessary to balance the inevitable impacts, particularly of the potential increase in car use, against the economic and community benefits in areas which are poorly served by other amenities and where unemployment and low wages are usually a concern. The alternative, being a stricter approach, is potentially more sustainable in terms of land protection but places more stringent limitations on the ability of farm businesses to diversify and so may be less sustainable in social and economic terms.[Check ISA]

**2.350** The Draft Final SA concluded that the draft policy was sustainable and consistent with government guidance. It was noted that implementation of the policy would require a trade off between the community and economic benefits that can arise from farm diversification against the potential for increased car use that may be generated as a result.

### Assessment

**2.351** The policy allows for farm diversification, and for new buildings for these uses if they meet certain criteria. Criteria dealing with the scale, character and location of proposals have been included replacing thresholds as although there is a risk that schemes may escalate in size resulting in major developments in relatively unsustainable locations with potentially detrimental impacts on the surrounding countryside it was thought that thresholds could be unnecessarily limiting. Other criteria concerning the impact of schemes on the farm business have been clarified.

### Proposed Submission Policy

**2.352** Policy P 9 Farm Diversification will support delivery of Core Strategy Objectives 4, 6 and 17 and Policies CS1 Sustainable Development in Huntingdonshire, CS3 The Settlement Hierarchy and CS7 Employment Land.

### Proposals Map

**2.353** Policy P 9 Farm Diversification does not require any designations on the Proposals Map.

#### Supports the East of England Plan

**Policies:** SS4: Towns other than Key Centres and Rural Areas  
E6: Tourism  
ENV4: Agriculture, Land and Soils

#### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Health and well-being	Appropriate culture and leisure opportunities

# 2 Developing the DPD

Strategic Themes:	Outcomes:
Environment	Mitigate and adapt to climate change Efficient use of resources An environment that is protected and improved
Economic prosperity and skills	A comprehensive level of business support Increased visitor numbers

## Tourist Facilities and Attractions

**2.354** This policy was drawn up for the Development of Options consultation where it was consulted on as part of the draft policy for tourist facilities and visitor attractions.

### Summary of Consultation

**2.355** The Issues and Options consultation identified the need to ensure tourism development is sustainable, conserves the countryside and is accessible by non-car modes of travel. It identified the option to draw up policies to set out where proposals for tourist facilities and touring caravan and camp sites can be located to ensure development is sustainable. It was proposed that they should also include criteria to ensure development is accessible by a choice of means of transport and to limit occupation to holiday and seasonal occupation.

**2.356** There was overall support for developing tourism as a valuable contributor to the local economy. Most respondents were happy to see the lower threshold suggested as a cut-off for developments, however, concern was raised that tourism attractions can have a very varied intensity of use and so size thresholds for determining suitability may not be appropriate. The provision of tourist accommodation in conjunction with rural attractions was advocated to reduce the need to travel. Respondents considered that the policy should not constrain the expansion of existing tourist attractions in the countryside, specifically Huntingdon Racecourse.

**2.357** Comments on the draft policy were generally supportive, however concern was raised about the limitations on camping and caravanning sites.

**2.358** Comments from key consultees on the Draft Proposed Submission related to the clarity of the policy with regard to small scale expansion.

### Summary of Sustainability Appraisal

**2.359** The Initial SA concluded that the option primarily addresses tourist accommodation and the impact of leisure developments on the landscape. In promoting tourism facilities in the most sustainable places to increase accessibility by non-car modes the option was considered to be sustainable.

**2.360** The Draft Final SA concluded that the draft policy was supportive of sustainable tourism and the promotion of greater opportunities for tourism within the District. It was noted that the wording was such that tourist development is prevented in locations distant from local amenities and existing attractions.

### Assessment

**2.361** No reasonable alternatives were identified in the Issues and Options to the general policy approach of locating tourist facilities in the most sustainable locations as this was required by national policy. The alternatives for defining significant development as that over 1,000m<sup>2</sup> or on a site of over 1ha or 500m<sup>2</sup> and a site of over 0.5ha were identified. Although the preferred option used the lower threshold, the supporting evidence for this approach was considered to be limited so the standard definition of major development is used for the policy.

**2.362** Following the Development of Options consultation it was clear that in order to properly address tourism development separate policies for tourist accommodation and for tourist facilities and attractions would be appropriate. Tourist accommodation including camping and caravan sites is now dealt with in policy P 13 Tourist Accommodation.

**2.363** No changes were made with regard to issues of clarity raised in comments on the Draft Proposed Submission as the policy was considered to be sufficiently clear.

### Proposed Submission Policy

**2.364** Policy P 11 Tourist Facilities and Attractions will support delivery of Core Strategy Objectives 4, 5 and 6 and Policy CS7 Employment Land.

### Proposals Map

**2.365** Policy P 11 Tourist Facilities and Attractions does not require any designations on the Proposals Map.

#### Supports the East of England Plan

**Policies:** E6: Tourism  
C1: Cultural Development

#### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Sustainable patterns of growth and development Appropriate business infrastructure to support sustainable growth of the economy and reduce out-commuting Enhanced market town centres that serve their surrounding area
Health and well-being	Appropriate culture and leisure opportunities
Environment	An environment that is protected and improved
Inclusive, safe and cohesive communities	Accessible services for all
Economic prosperity and skills	Vibrant town centres Increased visitor numbers

## Water Based Tourism and Leisure

**2.366** This policy was drawn up following the Development of Options consultation.

# 2 Developing the DPD

## Summary of Consultation

**2.367** The Issues and Options consultation identified the need to ensure tourism development is sustainable, conserves the countryside and is accessible by non-car modes of travel. It identified the option to draw up policies to set out where proposals for tourist facilities and touring caravan and camp sites can be located to ensure development is sustainable. It was proposed that they should also include criteria to ensure development is accessible by a choice of means of transport and to limit occupation to holiday and seasonal occupation.

**2.368** There was overall support for developing tourism as a valuable contributor to the local economy.

**2.369** Comments on the Development of Options consultation identified a need for locally specific policy for water based leisure.

## Summary of Initial Sustainability Appraisal

**2.370** The policy was not appraised through the Initial or Draft Final SA processes.

## Assessment

**2.371** As Huntingdonshire has an extensive network of waterways and water bodies that are widely used for tourism, sport and leisure activities there is considered to be sufficient justification for a locally specific policy. There are a number of specific issues related to the use of waterways and bodies for tourism, sport and leisure that a specific policy can more satisfactorily address than by a general tourism uses policy.

**2.372** The policy addresses issues relating to water quality and quantity, navigation and boat movements and impact on the surrounding area.

## Proposed Submission Policy

**2.373** Policy P 12 Water-based Tourism and Leisure will support delivery of Core Strategy Objective 18 and Policies CS1 Sustainable development in Huntingdonshire, CS7 Employment Land and CS9 Strategic Green Infrastructure Enhancement.

## Proposals Map

**2.374** Policy P 12 Water-based Tourism and Leisure does not require any designations on the Proposals Map.

### Supports the East of England Plan

**Policies:** E6: Tourism  
ENV3: Biodiversity and Earth Heritage

### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Health and well-being	Appropriate culture and leisure opportunities
Environment	An environment that is protected and improved
Inclusive, safe and cohesive communities	Vibrant and cohesive communities

**Strategic Themes:**

Economic prosperity and skills

**Outcomes:**

Increased visitor numbers

## Tourist Accommodation

**2.375** This policy was drawn up following the Development of Options consultation where it was consulted on as part of the draft policy for tourist facilities and visitor attractions.

### Summary of Consultation

**2.376** The Issues and Options consultation identified the need to ensure tourism development is sustainable, conserves the countryside and is accessible by non-car modes of travel. It identified the option to draw up policies to set out where proposals for tourist facilities and touring caravan and camp sites can be located to ensure development is sustainable. It was proposed that they should also include criteria to ensure development is accessible by a choice of means of transport and to limit occupation to holiday and seasonal occupation.

**2.377** There was overall support for developing tourism as a valuable contributor to the local economy. Most respondents were happy to see the lower threshold suggested as a cut-off for developments, however, concern was raised that tourism attractions can have a very varied intensity of use and so size thresholds for determining suitability may not be appropriate. The provision of tourist accommodation in conjunction with rural attractions was advocated to reduce the need to travel. Respondents considered that the policy should not constrain the expansion of existing tourist attractions in the countryside, specifically Huntingdon Racecourse.

**2.378** Comments received on the draft policy for tourist facilities and visitor attractions raised issues relating to camping and caravan sites. Comments relating to town centre and retail uses also raised issues relating to tourist accommodation.

**2.379** Comments from key consultees on the Draft Proposed Submission proposed specific reference to tourist accommodation at marinas.

### Summary of Sustainability Appraisal

**2.380** The Initial SA concluded that the option primarily addresses tourist accommodation and the impact of leisure developments on the landscape. In promoting tourism facilities in the most sustainable places to increase accessibility by non-car modes the option was considered to be sustainable.

**2.381** The Draft Final SA concluded that the draft policy was supportive of sustainable tourism and the promotion of greater opportunities for tourism within the District. It was noted that the wording was such that tourist development is prevented in locations distant from local amenities and existing attractions.

### Assessment

**2.382** The policy was drawn up following the comments on tourist and town centre uses identified issues relating to tourist accommodation. Although the preferred option contained the draft policy for tourist facilities and visitor attractions including tourist accommodation it was considered appropriate to separate tourist accommodation in order to aid clarity and address specific issues.

**2.383** The policy expands on those parts of the draft policy for tourist facilities and visitor attractions that dealt with tourist accommodation and includes amendments to allow more flexibility for the location of camping and caravanning sites. The policy also clarifies the approach to hotel proposals.

## 2 Developing the DPD

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**2.384** The comments from key consultees on the Draft Proposed Submission proposing a specific reference to tourist accommodation at marinas were not accepted as it was considered that the policy made appropriate provision.

### Proposed Submission Policy

**2.385** Policy P 13 Tourist Accommodation will support delivery of Core Strategy Objectives 4, 5 and 6. Policy CS7 Employment Land.

### Proposals Map

**2.386** Policy P 13 Tourist Accommodation does not require any designations on the Proposals Map.

#### Supports the East of England Plan

**Policies:** SS4: Towns other than Key Centres and Rural Areas  
E6: Tourism

#### Supports the Sustainable Community Strategy

**Strategic Themes:**

Growth and infrastructure

Health and well-being

Economic prosperity and skills

**Outcomes:**

Enhanced market town centres that serve their surrounding area

Appropriate culture and leisure opportunities

A comprehensive level of business support  
Ensure land and premises for economic growth  
Vibrant town centres  
Increased visitor numbers

## Contributing to Successful Development

**2.387** The consultation period on the Development of Options stage coincided with receipt of the Local Investment Framework in January 2009. The Local Investment Framework (LIF) contains detailed assessments of the infrastructure requirements for the District based on the anticipated growth projections of the Core Strategy. These have now been examined and adopted, giving far greater certainty on likely infrastructure requirements needed in order to deliver successful development in Huntingdonshire than was available at the time of the Development of Options consultation. A significant role of the LIF was to determine the scope and scale of public sector and landowner/ developer contributions required to deliver the supporting physical and social infrastructure.

**2.388** The LIF considered requirements for:

- Transport and utility infrastructure
- Social infrastructure incorporating education, healthcare, community facilities, leisure and recreation and essential and emergency services
- Strategic green space



**2.389** Broad guidance on infrastructure requirements is set out in Core Strategy policy CS10; a limited range of more specific infrastructure requirements were addressed in the Development of Options including indoor and outdoor sports, open space, public art and sustainable travel. Representations on the Development of Options broadly sought greater clarity on what would be required by way of infrastructure contributions from landowners and potential developers, what thresholds would be involved, what types of development would be expected to contribute particular elements of infrastructure and how viability issues would be taken into account when contributions are required.

**2.390** To provide greater certainty for landowners and potential developers as soon as possible this chapter has been instigated to provide a comprehensive set of policies indicating the nature and scope of contributions likely to be required. These will be complemented by a Supplementary Planning Document on Developer Obligations giving detailed guidance and requirements on the range and level of infrastructure provision required and the mechanisms for securing contributions.

**2.391** All policies were amended to ensure consistency following comments on the Draft Proposed Submission.

## Green Space, Play and Sports Facilities Contributions

**2.392** This policy was drawn up for the Development of Options consultation where it was consulted on as part of the draft policy for outdoor sports and recreation facilities and open space and the draft policy for indoor sports and recreation facilities.

### Summary of Consultation

**2.393** The Issues and Options paper did not include an option on the provision of outdoor sports and recreation facilities and open space or on indoor sports and recreation facilities. The focus was primarily on the protection of existing areas of open space. However, a number of respondents identified the lack of consideration given to provision of outdoor and indoor sports and recreation facilities and open space as a short coming. Furthermore, a number of respondents also sought policies to enhance existing areas of open space. The Council recognises that the omission of a requirement to provide open space and other sports related facilities was an oversight.

**2.394** Comments on the draft policies generally accepted the principle of seeking direct provision or contributions towards indoor and outdoor sports and recreation facilities and open space. However, significant concerns were identified about the clarity of requirements, what thresholds were involved and how the impact of the requirements on potential viability would be taken into account.

**2.395** Comments from key consultees on the Draft Proposed Submission related to Natural England's ANGSt standards and to issues of clarity.

### Summary of Sustainability Appraisal

**2.396** No options were assessed within the Initial SA process.

**2.397** The Draft Final SA concluded that the draft policy for outdoor sports and recreation facilities and open space was sustainable and based on local evidence provided from the PNP Open Space, Sport and Recreational Needs Assessment and Audit (2006). It was noted that it would ensure that in new residential development residents have appropriate access to open space and recreational facilities. It concluded that the draft policy for indoor sports and recreation facilities was a sustainable policy which sought to contribute to the pursuit of healthy lifestyles. It was noted that it had been formulated from local evidence and studies.

### Assessment

**2.398** The consultation responses clearly highlighted a need for policies to provide new and enhanced outdoor and indoor recreation facilities and open space. The information in the LIF provided a robust basis for the proposed submission policy. It is an established principle to seek contributions of sports and recreational facilities and open

# 2 Developing the DPD

space in Section 106 agreements as part of the planning process. To avoid repetition both indoor and outdoor sports and recreation elements have been consolidated into a single policy. The only alternative to not having a policy is to rely on individual section 106 agreements which would not provide the same level of certainty.

**2.399** No changes were made to the policy with regard to Natural England's ANGSt standards, however additional information was included in the supporting text. The policy was amended to address the issues of clarity raised.

### Proposed Submission Policy

**2.400** Policy D1 Green Space, Play and Sports Facilities Contributions will support delivery of Core Strategy Objectives 9, 14 and 15 and Policies CS1 Sustainable Development in Huntingdonshire, CS9 Strategic Green Space Enhancement and CS10 Contributions to Infrastructure Requirements.

### Proposals Map

**2.401** Policy D1 Green Space, Play and Sports Facilities Contributions does not require any designations on the Proposals Map.

#### Supports the East of England Plan

**Policies:** SS2: Overall spatial strategy  
C1: Cultural development  
ENV1: Green infrastructure  
ENV3: Biodiversity and Earth Heritage

#### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Sustainable patterns of growth and development Improved health, education/learning, training, community and leisure infrastructure and strategic open space through the appropriate provision of facilities to meet current and future needs
Health and well-being	Appropriate culture and leisure opportunities Individuals choose healthy lifestyles
Environment	An environment that is protected and improved
Children and young people	Safe, accessible, positive activities for children and young people

## Transport Contributions

**2.402** This policy was drawn up for the Proposed Submission document following receipt of the LIF.

## Summary of Consultation

**2.403** Comments received on the Development of Options consultation were supportive of the draft policy proposed for sustainable travel. Comments from the Highways Agency in particular in combination with the LIF prompted consideration of a clearer approach to seeking transport contributions from development.

**2.404** No comments were received from key consultees on the Draft Proposed Submission.

## Summary of Sustainability Appraisal

**2.405** The policy was not assessed in the Initial or Draft Final SA processes. The Final SA concluded that

## Assessment

**2.406** The policy has been prepared following receipt of the LIF indicating clear requirements for contributions from potential developments towards transport schemes to ameliorate the impact of the development. It has been incorporated into the Contributing to Successful Development chapter to consolidate guidance on contributions required from developers into one place.

## Proposed Submission Policy

**2.407** Policy D 2 Transport Contributions will support delivery of Core Strategy Objectives 1, 6 and 14 and Policies CS1 Sustainable Development in Huntingdonshire and CS10 Contributions to Infrastructure Requirements.

## Proposals Map

**2.408** Policy D 2 Transport Contributions does not require any designations to be shown on the Proposals Map.

### Supports the East of England Plan

**Policies:**

- SS2: Overall Spatial Strategy
- SS4: Towns other than Key Centres and Rural Areas
- T1: Regional Transport Strategy Objectives and Outcomes
- T2: Changing Travel Behaviour
- T3: Managing Traffic Demand
- T4: Urban Transport
- T6: Strategic and Regional Road Networks
- T7: Transport in Rural Areas
- T8: Local Roads
- T9: Walking, Cycling and other Non-Motorised Transport
- T13: Public Transport Accessibility

### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Sustainable patterns of growth and development An upgraded and managed transport network, including public transport to service existing and growing communities effectively and safely Enhanced market town centres that serve their surrounding area

# 2 Developing the DPD

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Environment	Mitigate and adapt to climate
Economic prosperity and skills	An appropriate physical infrastructure to support sustainable growth of the economy

## Community Facilities Contributions

**2.409** This policy was drawn up for the Proposed Submission document following receipt of the LIF.

### Summary of Consultation

**2.410** No comments were received from key consultees on the Draft Proposed Submission.

### Summary of Sustainability Appraisal

**2.411** The policy was not assessed in the Initial or Draft Final SA processes. The Final SA concluded that

### Assessment

**2.412** The policy has been prepared following receipt of the LIF indicating clear requirements for contributions from potential developments towards infrastructure provision for community facilities to ameliorate the impact of the development. It has been incorporated into the Contributing to Successful Development chapter to consolidate guidance on contributions required from developers into one place.

### Proposed Submission Policy

**2.413** Policy D 3 Community Facilities Contributions will support delivery of Core Strategy Objectives 1 and 7 and Policies CS1 Sustainable Development in Huntingdonshire and CS10 Contributions to Infrastructure Requirements.

### Proposals Map

**2.414** Policy D 3 Community Facilities Contributions does not require any designations to be shown on the Proposals Map.

<b>Supports the East of England Plan</b>	
<b>Policy:</b>	SS2: Overall Spatial Strategy C1: Cultural Development

## Supports the Sustainable Community Strategy

### Strategic Themes:

Growth and infrastructure

Health and well-being

Environment

Children and young people

Inclusive, safe and cohesive communities

### Outcomes:

Sustainable patterns of growth and development  
Improved health, education/learning, training, community and leisure infrastructure and strategic open space through the appropriate provision of facilities to meet current and future needs

Appropriate culture and leisure opportunities  
Individuals choose healthy lifestyles

An environment that is protected and improved

Safe, accessible, positive activities for children and young people

Accessible services for all

## Utilities Contributions

**2.415** This policy was drawn up for the Proposed Submission document following receipt of the LIF.

### Summary of Consultation

**2.416** Comments from key consultees on the Draft Proposed Submission related to issues of clarity.

### Summary of Sustainability Appraisal

**2.417** The policy was not assessed in the Initial or Draft Final SA processes. The Final SA concluded that

### Assessment

**2.418** The policy has been prepared following receipt of the LIF indicating clear requirements for contributions from potential developments towards provision of utilities infrastructure to service the needs of new development. It has been incorporated into the Contributing to Successful Development chapter to consolidate guidance on contributions required from developers into one place.

**2.419** Changes were made to the policy with regard to the issues of clarity raised by key consultees on the Draft Proposed Submission.

### Proposed Submission Policy

**2.420** Policy D 4 Utilities Contributions will support delivery of Core Strategy Objectives 1 and 7 and Policies CS1 Sustainable Development in Huntingdonshire and CS10 Contributions to Infrastructure Requirements.

### Proposals Map

**2.421** Policy D 4 Utilities Contributions does not require any designations to be shown on the Proposals Map.

## 2 Developing the DPD

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

### Supports the East of England Plan

**Policies:** SS2: Overall spatial strategy  
WAT2: Water infrastructure  
WAT3: Integrated water management  
WAT4: Flood risk management

### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Sustainable patterns of growth and development Appropriate flood risk management, sustainable water supply and sufficient provision of utilities including the development of local renewable sources of energy
Environment	Mitigate and adapt to climate change
Economic prosperity and skills	An appropriate physical infrastructure to support sustainable growth of the economy

## Emergency and Essential Services Contributions

**2.422** This policy was drawn up for the Proposed Submission document following receipt of the LIF.

### Summary of Consultation

**2.423** No comments were received from key consultees on the Draft Proposed Submission.

### Summary of Sustainability Appraisal

**2.424** The policy was not assessed in the Initial or Draft Final SA processes. The Final SA concluded that

### Assessment

**2.425** The policy has been prepared following receipt of the LIF indicating clear requirements for contributions from potential developments towards provision of emergency and essential services to ameliorate the impact of the development. It has been incorporated into the Contributing to Successful Development chapter to consolidate guidance on contributions required from developers into one place.

### Proposed Submission Policy

**2.426** Policy D 5 Emergency and Essential Services Contributions will support delivery of Core Strategy Objectives 1 and 7 and Policies CS1 Sustainable Development in Huntingdonshire and CS10 Contributions to Infrastructure Requirements.

### Proposals Map

**2.427** Policy D 5 Emergency and Essential Services Contributions does not require any designations to be shown on the Proposals Map.

## Supports the East of England Plan

**Policies:** SS2: Overall Spatial Strategy  
ENV7: Quality in the Built Environment

## Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Appropriate flood risk management, sustainable water supply and sufficient provision of utilities including the development of local renewable sources of energy Improved health, education/learning, training, community and leisure infrastructure and local and strategic open space through the appropriate provision of facilities to meet current and future needs
Inclusive, safe and cohesive communities	Accessible services for all Reduced anti social behaviour (including criminal damage) Reduced crime Reduced fear of crime Effective neighbourhood management in appropriate communities

## Environmental Improvements Contributions

**2.428** This policy was drawn up for the Proposed Submission document following receipt of the LIF.

### Summary of Consultation

**2.429** Comments from key consultees on the Draft Proposed Submission related to issues of clarity.

### Summary of Sustainability Appraisal

**2.430** The policy was not assessed in the Initial or Draft Final SA processes. The Final SA concluded that

### Assessment

**2.431** The policy has been prepared following receipt of the LIF indicating clear requirements for contributions from potential developments towards environmental improvements to ameliorate the impact of the development. It has been incorporated into the Contributing to Successful Development chapter to consolidate guidance on contributions required from developers into one place.

**2.432** Changes were made to the policy with regard to the issues of clarity raised by key consultees on the Draft Proposed Submission.

### Proposed Submission Policy

**2.433** Policy D 6 Environmental Improvements Contributions will support delivery of Core Strategy Objectives 1 and 7 and Policies CS1 Sustainable Development in Huntingdonshire and CS10 Contributions to Infrastructure Requirements.

# 2 Developing the DPD

## Proposals Map

**2.434** Policy D 6 Environmental Improvements Contributions does not require any designations to be shown on the Proposals Map.

### Supports the East of England Plan

**Policies:** SS2: Overall spatial strategy  
ENV7: Quality in the built environment

### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Improved health, education/learning, training community and leisure infrastructure and local and strategic open space through the appropriate provision of facilities to meet current and future needs
Health and well being	Appropriate culture and leisure opportunities
Environment	An environment that is protected and improved
Economic prosperity and skills	Increased visitor numbers

## Drainage and Flood Prevention Contributions

**2.435** This policy was developed for the Proposed Submission document following receipt of the LIF.

### Summary of Consultation

**2.436** Comments from key consultees on the Draft Proposed Submission related to issues of clarity.

### Summary of Sustainability Appraisal

**2.437** The policy was not assessed in the Initial or Draft Final SA processes. The Final SA concluded that

### Assessment

**2.438** The policy has been prepared following receipt of the LIF indicating clear requirements for contributions from potential developments towards drainage and flood prevention infrastructure to ameliorate the impact of the development. It has been incorporated into the Contributing to Successful Development chapter to consolidate guidance on contributions required from developers into one place.

**2.439** Changes were made to the policy with regard to the issues of clarity raised by key consultees on the Draft Proposed Submission.



## Proposed Submission Policy

**2.440** Policy D 7 Drainage and Flood Prevention Contributions will support delivery of Core Strategy Objectives 1 and 7 and Policies CS1 Sustainable Development in Huntingdonshire and CS10 Contributions to Infrastructure Requirements.

## Proposals Map

**2.441** Policy D 7 Drainage and Flood Prevention Contributions does not require any designations to be shown on the Proposals Map.

### Supports the East of England Plan

**Policies:** SS2: Overall Spatial Strategy  
WAT2: Water Infrastructure  
WAT3: Integrated Water Management  
WAT4: Flood Risk Management

### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Growth and infrastructure	Sustainable patterns of growth and development Appropriate flood risk management, sustainable water supply and sufficient provision of utilities including the development of local renewable sources of energy
Environment	Mitigate and adapt to climate change Efficient use of resources An environment that is protected and improved

## Public Art

**2.442** This policy was drawn up for the Development of Options consultation where it was consulted on as the draft policy for public art.

## Summary of Consultation

**2.443** There was some support for the draft policy, however some issues of concern were identified, particularly with regard to contributions being sought from all development above the threshold when the development may not be publicly accessible and with regard to the level of contributions and the flexibility of commissioning.

**2.444** Comments from key consultees on the Draft Proposed Submission related to the clarity of the policy and terminology use.

# 2 Developing the DPD

## Summary of Sustainability Appraisal

**2.445** The Draft Final SA concluded that the draft policy was sustainable and in accordance with government guidance on urban design. It was noted that the draft was locally specific and covered a subject not well covered by national guidance.

**2.446** The Final SA concluded that

## Assessment

**2.447** The policy has been amended from the draft so that public art contributions are encourage for minor scale residential development but not required. It has been incorporated into the Contributing to Successful Development chapter to consolidate guidance on contributions required from developers into one place.

**2.448** Changes were made to the policy and supporting text with regard to issues of clarity and terminology raised in comments on the Draft Proposed Submission.

## Proposed Submission Policy

**2.449** Policy D 8 Public Art Contributions will support delivery of Core Strategy Objective 11 and Policies CS1 Sustainable Development in Huntingdonshire and CS10 Contributions to Infrastructure Requirements.

## Proposals Map

**2.450** Policy D 8 Public Art Contributions does not require any designations to be shown on the Proposals Map.

### Supports the East of England Plan

**Policies:** SS2: Overall spatial strategy  
ENV7: Quality in the built environment

### Supports the Sustainable Community Strategy

<b>Strategic Themes:</b>	<b>Outcomes:</b>
Health and well being	Appropriate culture and leisure opportunities
Environment	An environment that is protected and improved
Inclusive, safe and cohesive communities	Vibrant and inclusive communities
Economic prosperity and skills	Vibrant town centres Increased visitor numbers

## Monitoring

**2.451** Brief paragraph detailing origins in original Core Strategy and AMR.

**2.452** Comments from key consultees on the Draft Proposed Submission related to monitoring geology, green infrastructure and biodiversity.

**2.453** Changes were made with regard to issues of biodiversity monitoring. While the Council would be happy to expand monitoring of geology and green infrastructure additional discussion with partners and key bodies to determine appropriate indicators is considered necessary.

## **Draft Policies not taken forward**

**2.454** During the Development of Options consultation the Council identified specific topics that would not be taken forward in drawing up the DPD. These topics included the draft objectives put forward in the Issues and Options consultation and a specific policy on landscape character. For more information please see the Development of Options document.

**2.455** In drawing up the Proposed Submission document the Council reorganised how policies were grouped together specifically to enable appropriate coverage of mitigation and adaptation to climate change and the approach to seeking contributions from developers. Information concerning how the policies have been organised is included in the relevant sections of this Statement of Consultation.

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

## Appendix 1 Comments Received Summer 2007

1.1 The following tables give individual summaries of the comments received during the consultation on Issues and Options conducted between May 2007 and July 2007.

**Table 7 General Comments**

<b>Name/ Agent</b>	<b>ID/ Type</b>	<b>Summary</b>
Louise Lovegrove (DLP Planning Ltd) <i>Louise Lovegrove (DLP Planning Ltd)</i>	<b>2104</b> Observations	DPDs should not be progressed until there is certainty that the Core Strategy is sound
Colin Bambury (Highways Agency)	<b>2347</b> Observations	Document could be enhanced by reference to Department for Transport Circular 02/2007 Planning and the Strategic Road Network, and the Guidance on Transport Assessment (March 2007).
John Chase (Buckden Parish Council)	<b>2421</b> Observations	The aims expressed within the document are generally very laudable, but will not provide any positive protection without detailed policies.
Paul Cronk (HBF)	<b>2749</b> Observations	The Council must carefully consider the extent to which the objectives and content of the draft document are consistent with the latest national Government and other important policy guidance.
Paul Cronk (HBF)	<b>2750</b> Object	The options seem vague and simplistic and don't cover a range of alternative and viable options. Options are put forward without an up-to-date evidence base, and the document does not have regard to national planning policies. There is no clear vision on how the District might develop in the future.
Daniel Heenan <i>Julia Foster (David Lock Associates)</i>	<b>2767</b> Observations	Fully support statements and objectives deriving from national/regional policy, however duplication of national/regional policy objectives/requirements is not necessary.
Gallagher Estates <i>Mark Smith (Arup on behalf of Gallagher Estates)</i>	<b>2951</b> Object	Rather than ask respondents to suggest criteria or simply state that policies will set out criteria, the document should include criteria and ask for comments on them. For some issues there are no options/questions eg Listed Buildings.
Banning and Graves <i>Don Proctor (RPS Planning and Development)</i>	<b>2962</b> Object	Suggesting criteria based policies but not offering any suggestions as to what these "criteria" might be and no choice of criteria options to comment upon, is extremely unhelpful and unsatisfactory. National planning policy guidance provides a framework for making development control decisions and unless the Council can offer suggested policy approaches that provide a specific local slant, there seems little point in pursuing such policies, whether criteria based or not.
Matthew Stock (Redrow Homes (South Midlands) Ltd) <i>Helen Phillips (RPS Planning)</i>	<b>2965</b> Object	Suggesting criteria based policies but not offering any suggestions as to what these "criteria" might be and no choice of criteria options to comment upon is extremely unhelpful and unsatisfactory. National planning policy guidance provides a framework for making development control decisions and unless the Council can offer suggested policy approaches that provide a specific local slant, there seems little point in pursuing such policies, whether criteria based or not.
Maydo Pitt (GO-East)	<b>3032</b> Observations	Policies should not repeat national planning policy statements but should explain how they apply to the local area.
Maydo Pitt (GO-East)	<b>3034</b> Observations	We were unable to confidently assess the different options for criteria given the document's generality and lack of detail. In some instances only one option is proposed, and we expected more detailed options in relation to the local criteria that could be included in policies.

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
Maydo Pitt (GO-East)	3035 Observations	Many of the questions are too open-ended and do not address local contextual issues that could have provided more focus in relation to narrowing down options. The Authority should not present options that are unrealistic in terms of their openness in relation to the issues that actually exist, for example, national and regional policy.
Maydo Pitt (GO-East)	3036 Observations	There do not appear to be any specific issues, options or questions relating to listed buildings and conservation areas. There is no need to invent options, however, we might have expected options in relation to any local criteria to have been included or, alternatively, an indication that you will rely on legislation or national policy, which is an equally valid approach.
Maydo Pitt (GO-East)	3037 Observations	At submission stage the Authority will be expected to be able to demonstrate that all reasonable alternatives have been appraised and consulted upon at the earlier stages. We are not certain that this will be possible for all policy proposals based on the current consultation document.
P Blewett (Somersham Parish Council)	3278 Object	Object

**Table 8 Comments on Introduction**

Name/ Agent	ID/ Type	Summary
Chris Blackman (Cambridgeshire County Council)	2483 Observations	The SCI should be referenced.
Helen Locke (David Lock Associates (on behalf of O&H Properties)) <i>Helen Locke (David Lock Associates (on behalf of O&amp;H Properties))</i>	2513 Object	The document sets the scene for an overly long and complex document with detailed criteria-based policies which for the most part reiterate national policy, adopt an overly restrictive stance to development and do not offer any particular local interpretation. This is not appropriate.

**Table 9 Comments on Question 1**

Name/ Agent	ID/ Type	Summary
Ian Stapleton (Great & Little Gidding Parish Council)	2030 Support	AA should not be relevant for this document
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2198 Support	Support
John Chase (Buckden Parish Council)	2397 Support	Support
Chris Blackman (Cambridgeshire County Council)	2484 Object	In cases where information is not available or where there is doubt and further research is needed. AA is required.
John Blackburn (Little Paxton Parish Council)	2654 Support	Support
Stephen Dartford (Fenstanton Parish Council)	2687 Support	Support
Andy Chapman (Luminus)	2778 Support	Support
Gallagher Estates <i>Mark Smith (Arup on behalf of Gallagher Estates)</i>	2952 Object	AA may be relevant to this DPD. A screening report is needed, which will address the first stage of the Habitats Directive Assessment process which will examine whether the DC policies is likely to have any significant impacts.

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
Maydo Pitt (GO-East)	3033 Observations	An assessment as to whether an AA is necessary for the DC policies DPD should be undertaken.
Chantal Hagen (Natural England)	3485 Observations	An AA for the DC Policies DPD is necessary.

**Table 10 Comments on Option 1**

Name/ Agent	ID/ Type	Summary
Paul Cronk (HBF)	2751 Object	The document also has to address its share of overall housing growth, and not all people requiring new housing in the district can necessarily be defined as 'local people'.
Jockey Club Racecourses (Jockey Club Racecourses) <i>David Barker (Barton Willmore)</i>	2958 Object	Part 3 should be amended to state "enabling business development in rural areas, of new and existing rural businesses, in locations and on a scale which helps to provide local jobs, limits commuting and avoids adverse environmental impacts.
Huntingdon (Two) Ltd <i>Edward Ledwidge (Blue Sky Planning)</i>	3124 Observations	Part 3 should include: "Capitalising on regeneration opportunities and making the most efficient use of previously developed land"

**Table 11 Comments on Question 2**

Name/ Agent	ID/ Type	Summary
Pat Dillon (Toseland Parish Council)	2002 Support	Agree
Ian Stapleton (Great & Little Gidding Parish Council)	2032 Support	Objectives are good
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2199 Support	Support
John Chase (Buckden Parish Council)	2398 Support	Support
Chris Blackman (Cambridgeshire County Council)	2495 Object	The objectives should include reference to the Green Infrastructure Strategy for the Cambridge Sub-Region and should be cross-referenced to Option 26 in the Core Strategy.
Chris Blackman (Cambridgeshire County Council)	2496 Object	There is also a need to minimise impact of climate change, which relates to adaptation.
Chris Blackman (Cambridgeshire County Council)	2497 Object	In Objective 4, we consider that there is a need to go further than minimising the risk to health as a result of flooding.
Chris Blackman (Cambridgeshire County Council)	2498 Object	There is a need for the objectives to match more closely in some cases those in the core strategy
John Blackburn (Little Paxton Parish Council)	2655 Support with conditions	emphasis must be placed on enhancing the distinctive identities of our villages
Daniel Heenan <i>Julia Foster (David Lock Associates)</i>	2765 Support with conditions	Bullet 2 of option 1 should be amended to: "promoting development that makes prudent use of natural resources and minimises greenhouse gas emissions." Bullet 1 of option 3 should be amended to: "enabling business development in rural areas, in locations on a scale which helps to provide local jobs, limits commuting and minimises or mitigates adverse environmental impacts." A reference to tourism should be included.

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
Andy Chapman (Luminus)	2779 Support	Support
Persimmon Homes Ltd Hannah Trubshaw (Pegasus Planning Group)	2968 Support with conditions	An additional objective should be added regarding transport.
P Blewett (Somersham Parish Council)	3279 Support	Support
Chantal Hagen (Natural England)	3486 Support	As a package the objectives provide an excellent foundation for the DCP DPD. Some of the sub-objectives are particularly relevant and are strongly supported.
Ian Burns (Cambridgeshire PCT)	3517 Support	Support
Janet Innes-Clarke (Brampton Parish Council)	4141 Other	Should they not be the same as or more coherent with Core Strategy?
Katherine Fletcher (English Heritage)	4159 Observations	Option 1: In part 5 'and historic environment' should be added after 'species' in the second bullet.

**Table 12 Comments on Question 3**

Name/ Agent	ID/ Type	Summary
Cooke (Holme Parish Council)	1949 Other	Addition to list: Carefully monitor risk to health of changes in landscapes and habitats.
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2200 Observations	No
Colin Bambury (Highways Agency)	2342 Observations	We support an objective that sought to locate new development to areas where day to day facilities were readily accessible by public transport, walking and cycling thereby reducing the need to travel particularly by car, and help to minimise greenhouse gas emissions
John Chase (Buckden Parish Council)	2399 Observations	None
Chris Blackman (Cambridgeshire County Council)	2548 Object	Additional Issue – Implementation and delivery. In view of the references in the new Planning White Paper to the soundness test for implementation to enable local authorities to demonstrate how infrastructure will be provided, and to monitor how it is delivered.
John Blackburn (Little Paxton Parish Council)	2657 Support	Yes
Stephen Dartford (Fenstanton Parish Council)	2688 Observations	The following additional objectives should be included: To maximise the protection of conservation areas and listed buildings; To ensure the designated flood plains are protected; The defined existing settlement boundaries should be maintained and protected; and provision must be made for the allocation of areas for burial.
Andy Chapman (Luminus)	2781 Observations	More on brownfield regeneration
Persimmon Homes Ltd Hannah Trubshaw(Pegasus Planning Group)	2969 Observations	An additional objective on transport should be added to reflect the advice in PPG13 promoting 'safe, efficient and integrated transport system' which should 'create sustainable transport choices, promoting accessibility to jobs, shopping, leisure facilities

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
		and services by public transport, thus reducing the need to travel by car'.
P Blewett (Somersham Parish Council)	3280 Observations	No
Chantal Hagen (Natural England)	3487 Other	No

**Table 13 Comments on 'A Clean, 'Green', Attractive Place'**

Name/ Agent	ID/ Type	Summary
Stephen Dartford (Fenstanton Parish Council)	2703 Observations	Statements 14 and 15 To maximise the protection of conservation areas and listed buildings
Paul Cronk (HBF)	2752 Object	It is stated that an assessment could be required to accompany any proposal for major development to demonstrate how the proposal would minimise its impact on climate change. The HBF does not believe that such an approach is necessary. Different options could be identified for achieving this.
Katherine Fletcher (English Heritage)	4169 Observations	Listed buildings, conservation areas, sites of archaeological interest, historic parks and gardens are well covered here but the policy proposals are limited. Should take forward national policy and ENV6 in the Regional Spatial Strategy through a locally specific policy setting out criteria based on characterisation of the resource.

**Table 14 Comments on Issue 1**

Name/ Agent	ID/ Type	Summary
Thornhill Estates Andrew Hodgson (Savills)	2082 Support with conditions	We support protection of Huntingdonshire's characteristic landscape.

**Table 15 Comments on Question 4**

Name/ Agent	ID/ Type	Summary
John Chase (Buckden Parish Council)	1975 Object	We would wish to see the AOBL designation retained in addition to any general protection measures HDC seek to impose.
Ian Stapleton (Great & Little Gidding Parish Council)	2035 Object	Central government should have no say on what is of value and what is not. Keep control local.
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2201 Observations	Yes - It will be an improvement as all areas of landscape and the impact of development will be considered and not just those with designations.
John Chase (Buckden Parish Council)	2400 Object	No, retain areas of best landscape to ensure protection
Chris Blackman (Cambridgeshire County Council)	2501 Object	Agree that the criteria-based approach will provide sufficient protection if used in accordance with a rigorous landscape and townscape guidance. Reference is needed to Cambridgeshire's Landscape Guidelines and inclusion of the relevant character areas management principles should be considered.
John Blackburn (Little Paxton Parish Council)	2658 Support	Support
Stephen Dartford (Fenstanton Parish Council)	2689 Object	No. This does not fit with housing and business development in either objectives



# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
Andy Chapman (Luminus)	2782 Support	Support
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	2971 Object	Criteria based policies should be created in order to inform development proposals. Criteria used to assess development proposals in local areas of landscape character should be carefully drafted and not create rigid local designation that may unduly prevent acceptable sustainable development.
P Blewett (Somersham Parish Council)	3281 Observations	This is impossible to answer without knowing the competence with which the criteria will be drawn up and the rigour with which they will be enforced.
Chantal Hagen (Natural England)	3489 Support	We advocate that well-founded criteria-based approach will provide the necessary protection. Local landscape designations should not be necessary, provided robust Landscape Character Assessments for different character areas are in place to underpin criteria-based policies.
Janet Innes-Clarke (Brampton Parish Council)	4143 Observations	The 'Area of Best Landscape' designation should be retained because it can be applied to identify areas where high thresholds need to be reached when considering wider environmental and local factors before development is approved.

**Table 16 Comments on Issue 2**

Name/ Agent	ID/ Type	Summary
Neil Ireland (Southoe and Midloe Parish Council)	1966 Support with conditions	Isn't centralised energy efficiency more environmentally efficient?
Ian Stapleton (Great & Little Gidding Parish Council)	2036 Observations	Pressure on the environment from transport should be considered every time a development proposal is put forward.

**Table 17 Comments on Question 5**

Name/ Agent	ID/ Type	Summary
Sandra Mitcham (Holywell-cum-Needlingworth Parish Council)	2202 Support with conditions	Code could go further
Stamford Homes <i>Jane Gardner (Smith Stuart Reynolds)</i>	2339 Object	The Code for Sustainable Homes is directed at the Building Regulation system and compliance with the Code is not an area the Issues and Options Paper should address.
John Chase (Buckden Parish Council)	2401 Support	Support
Chris Blackman (Cambridgeshire County Council)	2504 Object	The policy should be strengthened by enforcing that all new developments must be compliant. Reference to the "Merton Rule" might be appropriate here, and whether the authority is a signatory to the policy.
Connolly Homes Plc, David Wilson Es <i>Stacey Rawlings (Bidwells)</i>	2599 Object	The Code is presently voluntary (except on English Partnerships land). The consultation document published in 2006 made it clear that the Government is considering making assessment under Code standards mandatory from April 2008. Given that the Government wish to achieve carbon neutral housing and commercial buildings within a decade, a co-ordinated method

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
		of assessment is needed and the Code offers an appropriate method.
Connolly Homes Plc, David Wilson Es <i>Stacey Rawlings (Bidwells)</i>	<b>2612</b> Support	The Code is presently voluntary (except on English Partnerships land). The consultation document published in 2006 made it clear that the Government is considering making assessment under Code standards mandatory from April 2008. Given that the Government wish to achieve carbon neutral housing and commercial buildings within a decade, a co-ordinated method of assessment is needed and the Code offers an appropriate method.
John Blackburn (Little Paxton Parish Council)	<b>2659</b> Other	No comment. National guidance
Stephen Dartford (Fenstanton Parish Council)	<b>2690</b> Support	Support
Andy Chapman (Luminus)	<b>2783</b> Support	Support
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	<b>2972</b> Support	Support
P Blewett (Somersham Parish Council)	<b>3282</b> Observations	Simple compliance with a standard is not enough – more definition of the level of compliance is needed.
Chantal Hagen (Natural England)	<b>3490</b> Support	Support
Ian Burns (Cambridgeshire PCT)	<b>3524</b> Support	Support

**Table 18 Comments on Question 6**

Name/ Agent	ID/ Type	Summary
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	<b>2203</b> Object	Object
John Chase (Buckden Parish Council)	<b>2402</b> Support with conditions	Yes, it should be a compulsory requirement
John Blackburn (Little Paxton Parish Council)	<b>2660</b> Other	No comment. National guidance
Stephen Dartford (Fenstanton Parish Council)	<b>2691</b> Support	Support
Andy Chapman (Luminus)	<b>2784</b> Support	Support
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	<b>2973</b> Observations	The Statement of Compliance should be submitted as part of the Design and Access Statement.
P Blewett (Somersham Parish Council)	<b>3283</b> Support with conditions	Yes and it should be subject to audit and measurement by planning enforcement
Chantal Hagen (Natural England)	<b>3491</b> Support	Support
Ian Burns (Cambridgeshire PCT)	<b>3525</b> Support	Support
Janet Innes-Clarke (Brampton Parish Council)	<b>4144</b> Support	Yes, builders and developers should have to state how they have complied with the code

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**Table 19 Comments on Option 4**

Name/ Agent	ID/ Type	Summary
Denis Skelly (RSPB)	2947 Support with conditions	Strongly support Option 4; however the impact on sensitive wildlife should be included in the wording of the definition of this statement to protect species and habitats of conservation importance which might not be covered by current statutory designation.
Chantal Hagen (Natural England)	3482 Observations	Option 4 should also seek to minimise impacts upon habitats/species outside the boundaries of existing national or international designations but are none-the-less of nature conservation importance.

**Table 20 Comments on Issue 4**

Name/ Agent	ID/ Type	Summary
Ian Stapleton (Great & Little Gidding Parish Council)	2037 Observations	Another cause of damage to the environment is from flooding. Sustainability should also encompass the need for water management.
Chris Blackman (Cambridgeshire County Council)	2505 Object	The issue should encompass minimising the risk of flooding in new developments and to existing built-up areas.
Stephen Dartford (Fenstanton Parish Council)	2692 Observations	Flood risk. All development areas should be included regardless of size. Action should be taken on the recommendation of the Environment Agency.
Paul Cronk (HBF)	2753 Observations	To require provisions in all circumstances would frustrate development. Policies should encourage the use of SUDS but should not impose their use until other stakeholders, especially those agencies who will be responsible for their long-term maintenance, accept them.
Catherine Moreton (Broughton Parish Council)	2925 Observations	The potential flooding impact to existing areas should also be considered when assessing the risk of flooding in new developments. There is no benefit from ensuring that flooding is minimised in a new development when the measures put in place cause flooding problems elsewhere.

**Table 21 Comments on Option 5**

Name/ Agent	ID/ Type	Summary
Cooke (Holme Parish Council)	1953 Observations	Need for a complete overhaul of drainage systems to support extra housing development
John Chase (Buckden Parish Council)	1977 Object	Not only proposed development but existing homes in flood plains should be the subject of retrospective mitigation measures.
Ian Burns (Cambridgeshire PCT)	3526 Support	Support

**Table 22 Comments on Issue 5**

Name/ Agent	ID/ Type	Summary
Thornhill Estates Andrew Hodgson (Savills)	2081 Support	Support
Stephen Dartford (Fenstanton Parish Council)	2693 Object	Statement 6 should read "to protect, improve and increase wildlife habitats"

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**Table 23 Comments on Option 6**

Name/ Agent	ID/ Type	Summary
Chris Blackman (Cambridgeshire County Council)	2507 Support with conditions	Support in principle, however grassland and possibly areas of previously developed land valuable for wildlife should be included. Reference is needed to the List of Principal important habitats as listed as part of Section 74 of the CROW act.

**Table 24 Comments on Question 7**

Name/ Agent	ID/ Type	Summary
Ian Stapleton (Great & Little Gidding Parish Council)	2040 Observations	Protect the environment first, provide houses second. Use brownfield sites first.
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2204 Observations	More use of Tree Preservation Orders
Chris Blackman (Cambridgeshire County Council)	2511 Observations	Criteria should be based on the principles in PPS9, PAS (Publicly Available Standard) 2010 Planning to halt the loss of biodiversity and Cambridgeshire and Peterborough's Planners and Developer's checklist.
John Blackburn (Little Paxton Parish Council)	2661 Object	Ensure that TOP and conservation, protection and enhancement policies and measures are rigorously enforced
Stephen Dartford (Fenstanton Parish Council)	2694 Observations	Consultation with all interested parties
Andy Chapman (Luminus)	2787 Object	Don't agree as habitat can often be recreated or relocated
Persimmon Homes Ltd Hannah Trubshaw (Pegasus Planning Group)	2974 Observations	The criteria based approach set out in the East of England Plan and paragraphs 21-25 of PPS7 should form the basis to the criteria
P Blewett (Somersham Parish Council)	3284 Observations	Historical integrity in the development; Visual impact; Sustaining biodiversity; Carbon footprint; Favourable treatment of development that restores marginal land to traditional landscape; Impact on water table; Marking and preserving of ancient archaeological sites.
Chantal Hagen (Natural England)	3493 Observations	The no net loss principle should be applied in all development proposals.
Chantal Hagen (Natural England)	3496 Observations	The importance of retaining in good health trees, hedgerows or other environmental features of visual, historic or nature conservation value on development sites can hardly be overstated
Janet Innes-Clarke (Brampton Parish Council)	4145 Observations	Trees and hedgerows should consist of appropriate and varied species and be protected

**Table 25 Comments on Issue 6**

Name/ Agent	ID/ Type	Summary
Thornhill Estates Andrew Hodgson (Savills)	2080 Support	Support
Chantal Hagen (Natural England)	3481 Observations	It should be explicit within issues 6 and option 7 that 'sites of importance for biodiversity or geology' include locally

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
		important sites (i.e. County Wildlife sites) and BAP Priority Habitats.

**Table 26 Comments on Option 7**

Name/ Agent	ID/ Type	Summary
Denis Skelly (RSPB)	2948 Support with conditions	Strongly support Option 7, however need to include the protection of internationally important designations in its wording for this objective. It is important to have in place provision for adequate protection for any sites that may be designated so in the future.
Chantal Hagen (Natural England)	3483 Object	The wording for Option 7 is not strong enough. Policies should do more than 'indicate' that development proposals should not cause harm to protected habitats and species.

**Table 27 Comments on Question 8**

Name/ Agent	ID/ Type	Summary
Rachel Pateman (The Wildlife Trust)	1963 Observations	Development that would damage CWSs, especially those that support Biodiversity Action Plan priority habitats, should not be permitted in the same way that development that would affect SSSIs would not be permitted.
John Chase (Buckden Parish Council)	2403 Observations	There should be no development or mitigation of development and consultation should be ensured with bodies such as English Nature & Wildlife Trust
Chris Blackman (Cambridgeshire County Council)	2517 Observations	There should be a presumption against any development that may adversely affect sites those that have been recognised and those that meet selection criteria but have not yet gone through a process of identification e.g. sites of CWS status.
Stephen Dartford (Fenstanton Parish Council)	2695 Observations	Consultation with all interested parties
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	2975 Observations	Criteria should reflect advice in paragraphs 9-12 of PPS9, policy ENV3: Biodiversity and Earth Heritage in the East of England Plan and in addition Policy ENV3 in the SOS proposed modifications. It is important that the criterion is distinguished between local and nationally important sites.
P Blewett (Somersham Parish Council)	3285 Observations	There should be a complete ban on development in these areas. There should be consideration of more projects (such as the Great Fen Project) which seek to restore marginal land to ancient natural habitat.
Chantal Hagen (Natural England)	3498 Observations	The no net loss principle should be applied in all development proposals. Sites designated as County Wildlife Site (including sites meeting CWS criteria but not yet designated) or Local Nature Reserve as well as sites recorded as BAP priority habitats or as hosting BAP/protected species should be protected within LDF policies

**Table 28 Comments on Issue 7**

Name/ Agent	ID/ Type	Summary
Stephen Dartford (Fenstanton Parish Council)	2696 Object	Statement 8 should read "to protect, improve and increase wildlife habitats"

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**Table 29 Comments on Option 8**

Name/ Agent	ID/ Type	Summary
Ian Stapleton (Great & Little Gidding Parish Council)	2039 Observations	Wild habitats are disregarded to a large extent. Development should avoid the destruction of trees.
Chris Blackman (Cambridgeshire County Council)	2518 Support	Support
Chantal Hagen (Natural England)	3484 Support with conditions	The necessity for future maintenance and management of the biodiversity resource conserved or created should be made explicit. Policies should also deal with the long term viability of conserved or created habitats. .BAP species should be included within this option.

**Table 30 Comments on Question 9**

Name/ Agent	ID/ Type	Summary
Rachel Pateman (The Wildlife Trust)	1964 Observations	Support. All developments should have to make provision for biodiversity both within and beyond the development site.
Sandra Mitcham (Holywell-cum-Needlingworth Parish Council)	2205 Observations	No
John Chase (Buckden Parish Council)	2404 Support with conditions	Support provided that HDC work closely with associations such as English Nature and Wildlife trust.
Chris Blackman (Cambridgeshire County Council)	2519 Observations	The emphasis on biodiversity within the policies needs to be supported by the new standard application form and local checklists for validation.
John Blackburn (Little Paxton Parish Council)	2662 Support with conditions	National guidance however yes.
Persimmon Homes Ltd Hannah Trubshaw (Pegasus Planning Group)	2976 Support with conditions	The emphasis on biodiversity should not restrict development proposals. The biodiversity action plan should also undergo a public consultation exercise prior to the adoption of this DPD.
P Blewett (Somersham Parish Council)	3288 Observations	If there was some evidence of enhancing biodiversity through sensitive development, this would be enough.

**Table 31 Comments on Issue 8**

Name/ Agent	ID/ Type	Summary
John Chase (Buckden Parish Council)	1978 Object	The later design guides are unwieldy and demonstrably aimed at developers. We would ask that the earlier and simple-to-understand Design Guide be resurrected (suitably amended).
Ian Stapleton (Great & Little Gidding Parish Council)	2046 Observations	Development and restoration must be sensitive to the local vernacular of the area.
Thornhill Estates Andrew Hodgson (Savills)	2079 Support	Support

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**Table 32 Comments on Option 9**

Name/ Agent	ID/ Type	Summary
Landmatch Ltd & Oxford University C (Landmatch Ltd & Oxford University Chest) <i>Andrew Hodgson (Savills)</i>	<b>2090</b> Support	Support. It is important that design is brought to the forefront of the planning process.
Philip Raiswell (Sport England)	<b>2330</b> Observations	The need for good building design needs to be linked to the need for good public space design which encourages active and healthy lifestyles.
Martin Page (D H Barford + Co.)	<b>2424</b> Object	There is no need for a policy requiring applications to be accompanied by supporting information. This should be provided in the Design and Access Statement.
Chris Blackman (Cambridgeshire County Council)	<b>2520</b> Observations	The second sentence of this option appears superfluous as it repeats regional guidance.

**Table 33 Comments on Question 10**

Name/ Agent	ID/ Type	Summary
Louise Lovegrove (DLP Planning Ltd) <i>Louise Lovegrove (DLP Planning Ltd)</i>	<b>2096</b> Observations	Supplementary Planning Guidance could be produced to indicate the format in which HDC wish to receive Design and Access Statements This is not a matter which needs to be included as a policy within a Development Control Policies DPD. It is not explained how policies relating to design, street scene and transport impacts relate to the obligations to provide a Design and Access Statement with each planning application.
Stamford Homes <i>Jane Gardner (Smith Stuart Reynolds)</i>	<b>2340</b> Object	It is inappropriate to set out criteria in a policy to assess the quality of design of proposals as there is a requirement for all planning applications to be accompanied by a Design and Access Statement.
John Blackburn (Little Paxton Parish Council)	<b>2663</b> Observations	Criteria as set out in option 9
Stephen Dartford (Fenstanton Parish Council)	<b>2697</b> Observations	To reflect the local environment. To maximise conservation areas and listed buildings.
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	<b>2977</b> Observations	Design criteria should advocate the use of the sustainable building code and follow the advice produced in Manual for Streets; The Companion guide to PPG3: Better Places to Live; and By Design: The companion guide to PPG1.
P Blewett (Somersham Parish Council)	<b>3286</b> Object	This is impossible to answer as the question is highly subjective
Chantal Hagen (Natural England)	<b>3501</b> Observations	In responding to your consultation in July 2005 on the previous draft Core Strategy Preferred Options report our predecessor body, the Countryside Agency, welcomed the suggested criteria outlined in that document. We continue to believe that these represent a good basis from which to develop the policy. In addition we continue to advocate the preparation of Village and Town Design Statements.
Katherine Fletcher (English Heritage)	<b>4160</b> Support with conditions	Support, and recommend the policy include criteria to ensure that developments respect their context, both visually and through a thorough analysis and understanding of the historic interest of the area (including historic landscape features and archaeology).

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**Table 34 Comments on Option 10**

Name/ Agent	ID/ Type	Summary
Chris Blackman (Cambridgeshire County Council)	<b>2521</b> Observations	Acknowledgement within the criteria of the value of 'greenery' within developments and the street scene is needed. Design issues, both at the area-wide and micro-level will also be important here.
Chris Blackman (Cambridgeshire County Council)	<b>2522</b> Observations	We recommend that Cambridgeshire Horizons Green Infrastructure Guidance should be considered when devising green space policies. This will provide guidance on the parts of Huntingdonshire within the Cambridge-Sub Region.

**Table 35 Comments on Question 11**

Name/ Agent	ID/ Type	Summary
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	<b>2206</b> Observations	Use of Village Design Statements
John Chase (Buckden Parish Council)	<b>2405</b> Observations	Based on existing criteria with enhancements such as the HDC Shop Front Design Guide
John Blackburn (Little Paxton Parish Council)	<b>2664</b> Observations	Criteria as set out in option 10
Stephen Dartford (Fenstanton Parish Council)	<b>2698</b> Observations	To reflect the local environment. To maximise conservation areas and listed buildings.
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	<b>2985</b> Observations	Criteria should be decided on a site specific basis, and should be dependent upon the neighbouring uses. With regards to the public realm careful consideration needs to be given to the location of public spaces,
Chantal Hagen (Natural England)	<b>3503</b> Observations	We would support the criteria suggested in the previous draft Core Strategy Preferred Options report of July 2005. Please see also our response above to Question 10, concerning the preparation of Town and Village Design Guides
Ian Burns (Cambridgeshire PCT)	<b>3527</b> Observations	We suggest that design criteria developed by CABE could be used as a starting point for consideration
Katherine Fletcher (English Heritage)	<b>4161</b> Support	Support. English Heritage's 'Streets for All' guidance makes recommendations on how historic streetscapes can be approached.

**Table 36 Comments on Issue 10**

Name/ Agent	ID/ Type	Summary
John Chase (Buckden Parish Council)	<b>1979</b> Support	Any development within Buckden would have a very harmful effect on the amenity and environment of our existing population.
Ian Stapleton (Great & Little Gidding Parish Council)	<b>2041</b> Observations	Transport has a massive impact on an environment. Provide a better public transport service and forget road expansion.
Colin Bambury (Highways Agency)	<b>2343</b> Observations	Recommend that paragraph 3.40 be expended to include reference to reducing the need to travel and encouraging travel by sustainable means rather than just mitigating the impact of development.
Colin Bambury (Highways Agency)	<b>2344</b> Observations	Request this option be expanded to reinforce the requirements of Department for Transport Circular 02/2007 Planning and the Strategic



# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
		Road Network and the "Guidance of Transport Assessment" (March 2007)

**Table 37 Comments on Option 11**

Name/ Agent	ID/ Type	Summary
Stephen Dartford (Fenstanton Parish Council)	2699 Observations	Developers must accommodate and address current transport weaknesses before submitting plans.

**Table 38 Comments on Issue 11**

Name/ Agent	ID/ Type	Summary
Ian Stapleton (Great & Little Gidding Parish Council)	2042 Observations	The countryside should be protected from large scale development on the grounds that it is not sustainable, with the only exception being airfields where infrastructure is already in place.
Thornhill Estates Andrew Hodgson (Savills)	2078 Support with conditions	Support. The District Council must recognise the need to provide appropriate facilities adjacent and well located to some identified environmental assets in order to ensure that the District attracts a significant number of tourists and benefit the local economy.

**Table 39 Comments on Option 12**

Name/ Agent	ID/ Type	Summary
Thornhill Estates Andrew Hodgson (Savills)	2068 Object	Wording within this policy should reflect that it will be necessary to provide some developments in the countryside in order to accommodate the necessary tourism and visitor facilities adjacent to the identified environmental assets within the district.
Landmatch Ltd & Oxford University C (Landmatch Ltd & Oxford University Chest) Andrew Hodgson (Savills)	2089 Support	The density of development should be assessed in order to ensure that efficient use of land is achieved through new development proposals. It is not appropriate to set single net density development proposals across the district.
P Moore Peter Moore (Henry H Bletsoe & Son)	2913 Observations	The sole use of the built up framework is far too subjective, open to interpretation and would lead to protracted discussions between applicants and the Council. Settlement boundaries currently provide an acceptable solution.

**Table 40 Comments on Question 12**

Name/ Agent	ID/ Type	Summary
Andrew Pym	1986 Object	Proposals should have full regard to the communities in rural areas and the need for the rural areas to be economically viable.
Pat Dillon (Toseland Parish Council)	2003 Object	In relation to the vague and ill-defined category of 'Smaller Settlements' neither of the two criteria would be appropriate for communities, such as Toseland, previously defined as having neither settlement boundaries or built up frameworks.
Church Commissioners Ian Smith (Smiths Gore)	2017 Observations	The use of settlement boundaries would be the most appropriate option. The certainty these provide is invaluable to both developers the general public/residents and the Local Planning Authority (LPA). The removal of settlement boundaries would result in more subjective decision making

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
		about individual proposals and, probably, a greater number of appeals for smaller residential developments where the LPA findings are questionable.
Michael Palmer-Asplin <i>Michael Brooks (Community and Regional Planning Services)</i>	2320 Other	DPD policy should not be so tight as to prevent well-designed modest sustainable extensions to rural settlements in appropriate locations.
D R Juggins <i>Simon Richardson (John Martin &amp; Associates)</i>	2332 Observations	In and around Smaller Settlements, the built-up framework criteria should be used. Policies to protect rural areas from inappropriate development need to be based on rational arguments and site-specific considerations rather than just vague presumptions.
Lenton Trustees (L019) <i>Simon Richardson (John Martin &amp; Associates)</i>	2354 Object	Policies to protect rural areas from inappropriate development need to be based on rational arguments and site-specific considerations rather than just vague presumptions.
John Chase (Buckden Parish Council)	2406 Observations	They should be restricted to those essential; for either agriculture or countryside recreational uses, including angling
Chris Blackman (Cambridgeshire County Council)	2524 Observations	Sustainability should still be a major factor in considering countryside development. Accessibility to jobs, education, and various other services and facilities. Need to address conversion of redundant rural buildings here.
John Blackburn (Little Paxton Parish Council)	2665 Observations	Criteria as set out in option 12 part of national guidance
Stephen Dartford (Fenstanton Parish Council)	2700 Observations	The defined existing settlement boundaries should be maintained and protected.
Daniel Heenan <i>Julia Foster (David Lock Associates)</i>	2763 Observations	Support the ambition to protect the countryside, but this must not lead to a completely inflexible restriction upon any development within the countryside. Would be contrary to PPS7.
Milton (Peterborough) Estates Ltd <i>Martin Bagshaw (John Martin &amp; Associates)</i>	2777 Observations	Settlement boundaries should be retained and drawn around the smaller settlements. In defining settlement boundaries appropriate potential development sites can be incorporated into the settlement to provide certainty and assist in the delivery of much needed housing required in the rural community.
Andy Chapman (Luminus)	2789 Observations	Can existing buildings be reused for a more appropriate use regardless of size
Pepys House Trustees (Pepys House Trustees) <i>Jenny Thomas (John Martin &amp; Associates)</i>	2825 Observations	Settlement boundaries should be drawn around the Market Towns and Key Service Centres in order to provide certainty and clarity to development options. Flexibility must be built in to the identification of settlement boundaries to allow for selected smaller non-strategic sites to come forward.
Pat Chater (Hemingford Abbots Parish Council)	2939 Observations	Development Control Policies should be rigorously applied to protect the character and structure of the village and to protect it from exploitation by over-development. At present some protection is afforded by planning restrictions which limit development to infill within the existing village envelope. If these principles are to be replaced by more flexible criteria-related consideration of individual development proposals then it is important that the character and the conservation status of the village be respected.
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	2988 Observations	Criteria for development within the open countryside should follow the advice written in PPS1. Development outside of the settlement boundaries should be restricted (as suggested in option 12) in order to protect the character of the open countryside.

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
PD & ER Burton <i>Martin Bagshaw (John Martin &amp; Associates)</i>	<b>3067</b> Observations	Settlement boundaries should be retained and drawn around the smaller settlements. In defining settlement boundaries appropriate potential development sites can be incorporated into the settlement to provide certainty and assist in the delivery of much needed housing required in the rural community.
C Behagg <i>Simon Richardson (John Martin &amp; Associates)</i>	<b>3068</b> Object	Policies to protect rural areas from inappropriate development need to be based on rational arguments and site-specific considerations rather than just vague presumptions.
T Pinner <i>Martin Bagshaw (John Martin &amp; Associates)</i>	<b>3080</b> Observations	Settlement boundaries should be retained and drawn around the smaller settlements. In defining settlement boundaries appropriate potential development sites can be incorporated into the settlement to provide certainty and assist in the delivery of much needed housing required in the rural community.
A J Ward <i>Martin Bagshaw (John Martin &amp; Associates)</i>	<b>3082</b> Observations	Settlement boundaries should be drawn around all the settlements in order to provide certainty and clarity to development options.
Elton Estates (Ref E061) <i>Jenny Thomas (John Martin &amp; Associates)</i>	<b>3085</b> Observations	In and around Smaller Settlements, the built-up framework criteria should be used.
J Daniels <i>Valerie Colby (John Martin Associates)</i>	<b>3094</b> Observations	Settlement boundaries should be drawn around the Market Towns and Key Service Centres in order to provide certainty and clarity to development options. Flexibility must be built in to the identification of settlement boundaries to allow for selected smaller non-strategic sites to come forward.
C Dodson <i>Valerie Colby (John Martin Associates)</i>	<b>3116</b> Observations	Settlement boundaries should be drawn around the Market Towns and Key Service Centres in order to provide certainty and clarity to development options. Flexibility must be built in to the identification of settlement boundaries to allow for selected smaller non-strategic sites to come forward.
P Blewett (Somersham Parish Council)	<b>3290</b> Observations	None. The proper application of the draft objectives and the scoring of development against those objectives are sufficient to cover all areas of the county and all scales of development.
Chantal Hagen (Natural England)	<b>3505</b> Observations	It is critically important that plans and planning policies should consider not just the location of rural development but the nature of that development, too. A particular concern is the role of development in enhancing the landscape through design and setting and in improving access to the countryside. Tranquillity often gets overlooked and should be included as a legitimate consideration in rural planning policy. High quality design is important in contributing to fitting into the local distinctiveness and landscape character of an area.

**Table 41 Comments on Question 13**

Name/ Agent	ID/ Type	Summary
R N Good, S J Good, S Leck <i>Simon Richardson (John Martin &amp; Associates)</i>	<b>1976</b> Observations	In and around Smaller Settlements, the built-up framework criteria should be used.
Andrew Pym	<b>1987</b> Object	Boundaries should take account of brown field sites and sites which can sensibly be developed if local circumstances justify it.

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
Pat Dillon (Toseland Parish Council)	2004 Object	It is not possible to answer this question because 'Smaller Settlements' is a vague and ill-defined category, and neither of the two criteria are relevant to communities, such as Toseland, that have neither settlement boundaries nor built-up frameworks.
R N Good, S J Good, S Leck <i>Simon Richardson (John Martin &amp; Associates)</i>	2008 Observations	Settlement boundaries should be drawn around the Market Towns and Key Service Centres. In and around Smaller Settlements, the built-up framework criteria would be more appropriate.
Church Commissioners <i>Ian Smith (Smiths Gore)</i>	2027 Observations	Favour the use of settlement boundaries in each of these categories of settlement.
Louise Lovegrove (DLP Planning Ltd) <i>Louise Lovegrove (DLP Planning Ltd)</i>	2097 Other	Settlement boundaries should be drawn for all settlements.
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2207 Observations	Settlement boundaries for Market Towns and Key Service Centres. Built up framework for Smaller Settlements.
Michael Palmer-Asplin <i>Michael Brooks (Community and Regional Planning Services)</i>	2327 Other	Criteria-based policies are preferred to settlement boundaries outside the Market Towns. The question is raised as to whether settlement boundaries (where used) should enclose potential development sites on the edge of settlements. We also seek clarity as to which DPD any future Representations on detailed settlement boundaries should be linked.
D R Juggins <i>Simon Richardson (John Martin &amp; Associates)</i>	2334 Observations	Settlement boundaries should be drawn around the Market Towns and Key Service Centres. In and around Smaller Settlements, the built-up framework criteria would be more appropriate.
Lenton Trustees (L019) <i>Simon Richardson (John Martin &amp; Associates)</i>	2353 Object	Settlement boundaries should not be drawn around the Key Service Centres as such boundaries cannot be firmly established until after the overall scale of new housing and employment development required in the District has been fully assessed and determined and appropriate site allocations have been evaluated.
John Chase (Buckden Parish Council)	2407 Observations	In all three instances boundaries should be drawn.
Martin Page (D H Barford + Co.)	2429 Object	Settlement boundaries should be drawn around all settlements.
Helen Locke (David Lock Associates (on behalf of O&H Properties)) <i>Helen Locke (David Lock Associates (on behalf of O&amp;H Properties))</i>	2515 Object	A criteria-based policy would be more appropriate than applying rigid settlement boundaries across the district, allowing the merits of each proposal to be more rigorously assessed rather than adopting a policy which could be interpreted to imply the principle of all development within a settlement being acceptable, and all development outside it being unacceptable.
C M Convine (Ref C188) <i>Simon Richardson (John Martin &amp; Associates)</i>	2653 Observations	Settlement boundaries should be drawn around the Market Towns and Key Service Centres
John Blackburn (Little Paxton Parish Council)	2666 Observations	Settlement boundaries for key service centres
Stephen Dartford (Fenstanton Parish Council)	2701 Support	Yes. For Key Service Centres
Paul Cronk (HBF)	2754 Observations	Drawing settlement boundaries provides much more certainty for everyone involved in the development process. Consequently, this is the best approach wherever possible.
Andy Chapman (Luminus)	2791 Observations	Built up framework for all

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
Lord De Ramsey Jenny Thomas (John Martin & Associates)	2827 Observations	Settlement boundaries should be drawn around the Market Towns and Key Service Centres. In and around Smaller Settlements, the built-up framework criteria would be more appropriate
Cambridgeshire County Council Valerie Colby (John Martin Associates)	2841 Observations	Settlement boundaries should be drawn around the Market Towns and Key Service Centres. Flexibility must be built in to the identification of settlement boundaries to allow for selected smaller non-strategic sites to come forward.
J D Stokes (ref S098) Valerie Colby (John Martin Associates)	2847 Observations	Settlement boundaries should be drawn around the Market Towns and Key Service Centres. Flexibility must be built in to the identification of settlement boundaries to allow for selected smaller non-strategic sites to come forward.
Michael Palmer-Asplin Michael Brooks (Community and Regional Planning Services)	2859 Observations	Whilst our preference is for criteria-based policies rather than defined settlement boundaries, except for the Market Towns, should the Authority be minded to retain settlement boundaries for Smaller Settlements, this Representation puts forward two options for amending the settlement boundary for Needingworth
Catherine Moreton (Broughton Parish Council)	2927 Observations	We have been happy to follow the 'settlement boundary' methodology in our village.
Michael Newman (The Stukeleys Parish Council)	2941 Observations	Settlement boundaries must be clearly shown for all categories including the smaller settlements in order to give certainty for determining planning applications. To leave this to every planning application will not give certainty to either the developers or local residents and will simply lengthen the development control process and increase the number of appeals.
Persimmon Homes Ltd Hannah Trubshaw (Pegasus Planning Group)	2990 Observations	Settlement boundaries should be drawn, and used to manage the growth around the market towns and key service centres. The settlement boundaries should be drawn in appropriate locations away from the existing built up areas so that adequate flexibility exists to accommodate a level of housing growth that is greater than the figure stated in Policy H1 of the EEP.
Persimmon Homes Ltd Hannah Trubshaw (Pegasus Planning Group)	2991 Observations	Settlement boundaries should be drawn, and used to manage the growth around the market towns and key service centres. The settlement boundaries should be drawn in appropriate locations away from the existing built up areas so that adequate flexibility exists to accommodate a level of housing growth that is greater than the figure stated in Policy H1 of the EEP.
C Behagg Simon Richardson (John Martin & Associates)	3070 Object	Settlement boundaries should not be drawn around the Key Service Centres as such boundaries cannot be firmly established until after the overall scale of new housing and employment development required in the District has been fully assessed and determined and appropriate site allocations have been evaluated.
Elton Estates (Ref E061) Jenny Thomas (John Martin & Associates)	3087 Observations	Settlement boundaries should be drawn around the Market Towns and Key Service Centres. In and around Smaller Settlements, the built-up framework criteria would be more appropriate.
J Daniels Valerie Colby (John Martin Associates)	3097 Observations	Settlement boundaries should be drawn around the Market Towns and Key Service Centres. Flexibility must be built in to the identification of settlement boundaries to allow for selected smaller non-strategic sites to come forward.
Edwards Valerie Colby (John Martin Associates)	3104 Observations	Settlement boundaries should be drawn around the Market Towns and Key Service Centres. Flexibility must be built in to the identification

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
		of settlement boundaries to allow for selected smaller non-strategic sites to come forward
P Blewett (Somersham Parish Council)	3293 Object	None. The proper application of draft objectives and the scoring of development against those objectives are sufficient to cover all areas of the county and all scales of development.
Cracknell, Godfrey, Waterworth <i>John Dadge (Barker Storey Matthews)</i>	3401 Observations	The use of "village envelopes" or settlement limits is well understood and provides a positive opportunity to indicate to the community and developers alike that within these defined areas development will be considered favourably.
Janet Innes-Clarke (Brampton Parish Council)	4146 Observations	Settlement boundaries should be drawn

**Table 42 Comments on Issue 12**

Name/ Agent	ID/ Type	Summary
Neil Ireland (Southoe and Midloe Parish Council)	1967 Observations	Is there a maximum national density? and can this be reviewed by the local planning authorities?

**Table 43 Comments on Option 13**

Name/ Agent	ID/ Type	Summary
Louise Lovegrove (DLP Planning Ltd) <i>Louise Lovegrove (DLP Planning Ltd)</i>	2098 Object	A range of densities are appropriate within the district distinguishing between different types of settlements and locations within settlements. It should be clearly set out that it is the purpose of the Design and Access Statement to indicate why a developer has selected a particular density and to justify a certain density in relation to local circumstances.
Roy Reeves (Warboys Parish Council)	2311 Observations	The minimum national density of 30 dwellings per hectare should be supported.

**Table 44 Comments on Option 14**

Name/ Agent	ID/ Type	Summary
Landmatch Ltd & Oxford University C (Landmatch Ltd & Oxford University Chest) <i>Andrew Hodgson (Savills)</i>	2088 Support	Support a range of densities to be applied for development proposals according to the settlement type character amenity and also location of the site within the district.
Louise Lovegrove (DLP Planning Ltd) <i>Louise Lovegrove (DLP Planning Ltd)</i>	2099 Support	A range of densities are appropriate within the district distinguishing between different types of settlements and locations within settlements. It should be clearly set out that it is the purpose of the Design and Access Statement to indicate why a developer has selected a particular density and to justify a certain density in relation to local circumstances.
Helen Locke (David Lock Associates (on behalf of O&H Properties)) <i>Helen Locke (David Lock Associates (on behalf of O&amp;H Properties))</i>	2516 Object	In favour of a policy approach based on Option 14, tailored to character areas and site characteristics, having regard to the overarching guidance in PPS3.
Andy Chapman (Luminus)	2813 Observations	A more flexible approach to brownfield sites both in terms of density and alternative uses regardless of where they are located providing appropriate criteria can be addressed.

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**Table 45 Comments on Question 14**

<b>Name/ Agent</b>	<b>ID/ Type</b>	<b>Summary</b>
Cooke (Holme Parish Council)	<b>1950</b> Other	In small settlements particularly need to employ densities sympathetic with existing environment
Andrew Pym	<b>1988</b> Object	The single minded devotion to densities promoted by ODPM and DCLG does not take account of the different densities to be found in the villages and the countryside. To focus on the 30 dwellings per hectare limit is likely to create new developments which are out of character with their locality and which will become less attractive in a short time, leading to deterioration in the character and amenity of the settlement as a whole.
R N Good, S J Good, S Leck <i>Simon Richardson (John Martin &amp; Associates)</i>	<b>2006</b> Observations	Although ensuring that land is used efficiently will be a key aim, it must be recognised that different forms of development, and different development densities, will be more or less appropriate across different sites in Market Towns, Key Service Centres and Smaller Settlements. As such Option 14 would be more appropriate.
Church Commissioners <i>Ian Smith (Smiths Gore)</i>	<b>2026</b> Observations	Option 14 should be the preferred option. Density should be dictated by the settlement type, character, and amenities in the immediate surrounding area to a development proposal. A single density requirement across the district would lead to developments that could be wholly out of character with their immediate surroundings.
Ian Stapleton (Great & Little Gidding Parish Council)	<b>2043</b> Observations	There can be no uniform density across all sites. Housing densities need to be determined depending on site, services etc
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	<b>2208</b> Observations	Option 14 - a range of densities would better reflect the generally rural nature of the district.
D R Juggins <i>Simon Richardson (John Martin &amp; Associates)</i>	<b>2336</b> Observations	Although ensuring that land is used efficiently will be a key aim, it must be recognised that different forms of development, and different development densities, will be more or less appropriate across different sites in Market Towns, Key Service Centres and Smaller Settlements. As such Option 14 would be more appropriate
Stamford Homes <i>Jane Gardner (Smith Stuart Reynolds)</i>	<b>2341</b> Observations	Applying a single net density for development proposals across the district is not appropriate and does not reflect the character and nature of the settlement, or location of the development proposal within the settlement. Option 14 should be pursued.
Lenton Trustees (L019) <i>Simon Richardson (John Martin &amp; Associates)</i>	<b>2352</b> Observations	Although ensuring that land is used efficiently will be a key aim, it must be recognised that different forms of development, and different development densities, will be more or less appropriate across different sites in Market Towns, Key Service Centres and Smaller Settlements. As such Option 14 would be more appropriate.
John Chase (Buckden Parish Council)	<b>2408</b> Observations	Option 14 it gives flexibility depending on location.
Martin Page (D H Barford + Co.)	<b>2434</b> Support	Support Option 14
Chris Blackman (Cambridgeshire County Council)	<b>2525</b> Observations	Option 14 is the better option. Applying a single net density across the whole district, before the character of certain developments is known, could prove to be inflexible.
Connolly Homes Plc, David Wilson Es <i>Stacey Rawlings (Bidwells)</i>	<b>2601</b> Object	In terms of densities, of the two options presented, Option 13 offers a responsive approach.

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
L.J.A Miers & Co Ltd (L.J.A Miers & Co Ltd) <i>Anoushka Knight (Bidwells)</i>	<b>2628</b> Object	In terms of densities, of the two options presented, Option 13 offers a responsive approach. Option 12, to set a net density for development proposals across the District, would not provide the opportunity for development proposals to respond to their local townscape context or the relative accessibility to public transport, jobs, services and facilities. In order to create the most sustainable patterns of development, a minimum density of 30 dwellings per hectare should be set with indicative ranges for specific locations (a similar approach to that contained within the present Huntingdonshire Local Plan). One approach we would support would be to set indicative density ranges similar to those set out in Annex C to the Consultation Draft of PPS3 (reproduced below). This is also a useful method of allowing the Local Planning Authority to estimate the likely contribution of particular sites to dwelling supply. Table 1: Indicative density ranges Location City Centre Urban Sub-urban Rural Density range (dwellings per hectare) Above 70 40-75 35-55 30-40
Lely (UK) Ltd <i>Anoushka Knight (Bidwells)</i>	<b>2645</b> Object	In terms of densities, of the two options presented, Option 13 offers a responsive approach. Option 12, to set a net density for development proposals across the District, would not provide the opportunity for development proposals to respond to their local townscape context or the relative accessibility to public transport, jobs, services and facilities. In order to create the most sustainable patterns of development, a minimum density of 30 dwellings per hectare should be set with indicative ranges for specific locations (a similar approach to that contained within the present Huntingdonshire Local Plan). One approach we would support would be to set indicative density ranges similar to those set out in Annex C to the Consultation Draft of PPS3 (reproduced below). This is also a useful method of allowing the Local Planning Authority to estimate the likely contribution of particular sites to dwelling supply. Table 1: Indicative density ranges Location City Centre Urban Sub-urban Rural Density range (dwellings per hectare) Above 70 40-75 35-55 30-40
C M Convine (Ref C188) <i>Simon Richardson (John Martin &amp; Associates)</i>	<b>2652</b> Observations	Although ensuring that land is used efficiently will be a key aim, it must be recognised that different forms of development, and different development densities, will be more or less appropriate across different sites in Market Towns, Key Service Centres and Smaller Settlements. As such Option 14 would be more appropriate.
John Blackburn (Little Paxton Parish Council)	<b>2667</b> Observations	Option 14 as the density must be in keeping with the local area and amenities
Stephen Dartford (Fenstanton Parish Council)	<b>2702</b> Observations	Inclusion must be made for public open spaces and play areas
Paul Cronk (HBF)	<b>2755</b> Observations	Density policy must take full and proper account of both locality and the specific type of housing provision.
Milton (Peterborough) Estates Ltd <i>Martin Bagshaw (John Martin &amp; Associates)</i>	<b>2775</b> Observations	Support a flexible approach to densities within Smaller Settlements which considered each development proposal on its own merits. There is a potential conflict between a policy which seeks to determine a standard density on developments within smaller settlements and the policy approach which seeks to restrict development in smaller settlements to residential infilling of up to three dwellings.
Andy Chapman (Luminus)	<b>2792</b> Observations	Option 14 is more flexible



# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
Lord De Ramsey <i>Jenny Thomas (John Martin &amp; Associates)</i>	<b>2828</b> Observations	Although ensuring that land is used efficiently will be a key aim, it must be recognised that different forms of development, and different development densities, will be more or less appropriate across different sites in Market Towns, Key Service Centres and Smaller Settlements. As such Option 14 would be more appropriate.
PD & ER Burton <i>Martin Bagshaw (John Martin &amp; Associates)</i>	<b>3066</b> Observations	Support a flexible approach to densities within Smaller Settlements which considered each development proposal on its own merits. There is a potential conflict between a policy which seeks to determine a standard density on developments within smaller settlements and the policy approach which seeks to restrict development in smaller settlements to residential infilling of up to three dwellings.
T Pinner <i>Martin Bagshaw (John Martin &amp; Associates)</i>	<b>3081</b> Observations	Support a flexible approach to densities within Smaller Settlements which considered each development proposal on its own merits. There is a potential conflict between a policy which seeks to determine a standard density on developments within smaller settlements and the policy approach which seeks to restrict development in smaller settlements to residential infilling of up to three dwellings.
Elton Estates (Ref E061) <i>Jenny Thomas (John Martin &amp; Associates)</i>	<b>3088</b> Observations	Although ensuring that land is used efficiently will be a key aim, it must be recognised that different forms of development, and different development densities, will be more or less appropriate across different sites in Market Towns, Key Service Centres and Smaller Settlements. As such Option 14 would be more appropriate.
Huntingdon (Two) Ltd <i>Edward Ledwidge (Blue Sky Planning)</i>	<b>3122</b> Observations	Option 14 would be preferable as it would allow appropriate development densities to be determined having regard to locational circumstances. However, it should be acknowledged that higher density development will be most appropriate in sustainable and accessible locations.
P Blewett (Somersham Parish Council)	<b>3294</b> Object	None. The proper application of the draft objectives and the scoring of development against those objectives are sufficient to cover all areas of the county and all scales of development.
Chantal Hagen (Natural England)	<b>3507</b> Observations	Support Option 14.
Janet Innes-Clarke (Brampton Parish Council)	<b>4147</b> Observations	Option 14 Housing density has to increase whether we like it or not, the number of people aspiring to big houses and plots cannot be realistically sustained. High density developments must be carefully designed to be attractive to live in and look at.
Katherine Fletcher (English Heritage)	<b>4162</b> Observations	Option 14 would be more appropriate in terms of advice in PPS1 which recommends that development should respect its context.

**Table 46 Comments on Question 15**

Name/ Agent	ID/ Type	Summary
Ian Stapleton (Great & Little Gidding Parish Council)	<b>2044</b> Observations	Conservation areas and buildings must also be protected. Some archaeological sites should also be protected.
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	<b>2209</b> Observations	No
Chris Blackman (Cambridgeshire County Council)	<b>2528</b> Observations	Policies need to recognise national guidance and should include a presumption in favour of nationally important historic environment assets, whether or not they are covered by designation. Policies should also allow for appropriate

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
		assessment and mitigation of damaging development proposals. Enhancement of the Historic Environment could be included in Draft Objective 5; to improve and conserve Huntingdonshire's environment.
John Blackburn (Little Paxton Parish Council)	2668 Observations	National guidance
Stephen Dartford (Fenstanton Parish Council)	2704 Observations	Consultations with relevant interested parties must take place
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	2992 Object	No, PPG16 covers all of the issues regarding sites of archaeological interest
P Blewett (Somersham Parish Council)	3295 Observations	No
Janet Innes-Clarke (Brampton Parish Council)	4148 Observations	Site of archaeological interest cannot all be protected above ground but, if found during building works, should be recorded to inform future generations

**Table 47 Comments on Issue 13**

Name/ Agent	ID/ Type	Summary
Michael Newman (The Stukeleys Parish Council)	2942 Support with conditions	There should be policies indicating the criteria which will be used to protect historic parks and gardens, but this should not be restricted to those sites on the National Register. The Council should draw up a list of locally important sites which should be similarly protected, an example of which is Stukeley Park in Great Stukeley.

**Table 48 Comments on Issue 14**

Name/ Agent	ID/ Type	Summary
Ian Stapleton (Great & Little Gidding Parish Council)	2045 Observations	Local people should have their say on what is appropriate. At all times the 'Heritage' of the building should be preserved.
Thornhill Estates <i>Andrew Hodgson (Savills)</i>	2077 Support with conditions	Support however the wording of the policy should not be too restrictive and binding on a proposed developer in order to allow them to demonstrate that a business use is not appropriate for the building.
Michael Newman (The Stukeleys Parish Council)	2943 Observations	The criteria in any policy must take full account of the traffic implications and the cumulative impact of such developments.

**Table 49 Comments on Question 16**

Name and Agent	ID / Type	Summary
Church Commissioners <i>Ian Smith (Smiths Gore)</i>	2024 Object	Although it seems appropriate that the redevelopment of rural buildings for business purposes is preferable, there should be some flexibility in this policy. In some cases a conversion to a residential use may be far more appropriate (surrounding area, highway matters, sustainability, attractiveness of rural buildings, rural location, market demand, viability etc).

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name and Agent	ID / Type	Summary
Sandra Mitcham (Holywell-cum-Needlingworth Parish Council)	2211 Observations	Important to set criteria to restrict scale of development. It should be appropriate to the location. It is too easy at present to expand sites with existing permissions in rural areas, which leads to unsympathetic and inappropriate development in the countryside.
John Chase (Buckden Parish Council)	2409 Observations	Proposals should not be detrimental to the quality of life of nearby residents
John Blackburn (Little Paxton Parish Council)	2669 Observations	National guidance
Stephen Dartford (Fenstanton Parish Council)	2705 Observations	Consultations with relevant interested parties must take place
Andrew Middleditch (Henry H Bletsoe & Son)	2907 Support with conditions	Support a policy which advocates and supports the re-use and redevelopment of rural farm buildings. Acknowledge the most preferable form of alternative use would be a business or tourist related use, but point out that there will be instances where a residential use will represent the most viable and appropriate use for some farm buildings. The policy should also allow for residential conversions in instances where business or tourism use would not be compatible with the principles of sustainable development, in terms of traffic generation.
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	2993 Observations	Policy wording should follow the advice in PPS7. If there is no identified need for the re-use of buildings in the countryside then an alternative /needed use should be sought.
P Blewett (Somersham Parish Council)	3297 Observations	The business should have a low carbon footprint. Should provide jobs in an area of scarcity. Should be sympathetic to nearby properties. Should not have a negative impact on biodiversity or landscape. Should be assessed for viability and sustainability
Katherine Fletcher (English Heritage)	4171 Observations	English Heritage has recently published 'The Conversion of Traditional Farm Buildings: A guide to good practice' and this may help in drawing up criteria for this policy.

**Table 50 Comments on Option 17**

Name/ Agent	ID/ Type	Summary
Chris Blackman (Cambridgeshire County Council)	2530 Object	The option is superfluous – especially in light of the current Planning White Paper, which proposes less restriction than the current General Development Order.

**Table 51 Comments on Question 17**

Name/ Agent	ID/ Type	Summary
Cooke (Holme Parish Council)	1951 Support	Provided rigorously enforced
Andrew Pym	1989 Object	It is wrong to impose a limit on houses which could cause significant inconvenience to the residents. Care by family and in the community is an important part of the government's approach and this should not be frustrated
Church Commissioners <i>Ian Smith (Smiths Gore)</i>	2023 Observations	Further details are required in respect of this policy with specific regard to the limitations and restrictions that will be imposed. A flexible approach is required, taking into account the specific

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
		circumstances and site characteristics relevant to individual development proposals.
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2212 Observations	Yes
D R Juggins <i>Simon Richardson (John Martin &amp; Associates)</i>	2337 Object	Policies to protect rural areas from inappropriate development need to be based on rational arguments and site-specific considerations rather than just vague presumptions
Lenton Trustees (L019) <i>Simon Richardson (John Martin &amp; Associates)</i>	2351 Object	Policies to protect rural areas from inappropriate development need to be based on rational arguments and site-specific considerations rather than just vague presumptions
John Chase (Buckden Parish Council)	2410 Support	Yes
Martin Page (D H Barford + Co.)	2439 Object	Any policy should not be a blanket approach with a specific limit for a floor increase or percentage increase.
John Blackburn (Little Paxton Parish Council)	2670 Observations	Option 17 is supported by national guidance
Stephen Dartford (Fenstanton Parish Council)	2706 Observations	Consultations with relevant interested parties must take place
Andy Chapman (Luminus)	2793 Object	Think this overprotects. Why the assumption that a replacement building can't be an enhancement?
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	2995 Support	Yes. Policies to limit extensions and alterations in the open countryside will protect its character.
P Blewett (Somersham Parish Council)	3298 Support	Support

**Table 52 Comments on Issue 16**

Name/ Agent	ID/ Type	Summary
Louise Lovegrove (DLP Planning Ltd) <i>Louise Lovegrove (DLP Planning Ltd)</i>	2100 Observations	Support the creation of sustainable communities but this does not necessarily mean there needs to be an increase in one and two bedroom properties suitable for smaller households. There is changing market demand. The council's assessments of housing need and supply are not the sole considerations which should be taken into account in determining the appropriate mix of dwelling, particularly on smaller sites.
Paul Cronk (HBF)	2757 Observations	Note with interest that a Strategic Housing Market Assessment is being undertaken.
Paul Cronk (HBF)	2758 Object	Par 4.3 suggests that because of smaller household sizes, everyone needs small dwellings. This is nonsense - the majority of new households are not seeking very small sized accommodation. A proper Housing Market Assessment should identify the range of new types of housing provision required.

**Table 53 Comments on Option 18**

Name/ Agent	ID/ Type	Summary
Landmatch Ltd & Oxford University C (Landmatch Ltd & Oxford University Chest)	2086 Support with conditions	Support. Developers/house builders should determine what the most appropriate mix of units should be for a residential

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
<i>Andrew Hodgson (Savills)</i>		development site based on their knowledge of market conditions and the local housing market. Interference from Local Authorities is likely to lead to poor schemes and potentially the appearance of undeveloped sites as the permitted mix restricts the site and makes it economically unviable for a developer to take forward.
Chris Blackman (Cambridgeshire County Council)	<b>2533</b> Observations	A significant proportion of new dwellings should be designed to lifetime mobility standards.
Stephen Dartford (Fenstanton Parish Council)	<b>2707</b> Observations	Consideration must be given to bungalows allowing downsizing and thus releasing other housing

**Table 54 Comments on Option 19**

Name/ Agent	ID/ Type	Summary
Daniel Heenan <i>Julia Foster (David Lock Associates)</i>	<b>2766</b> Object	Restricting development in the countryside is not a requirement of national policy. Suggest it is appropriate to seek to build on the clear and positive objectives set out in PPS7 to guide appropriate development in the countryside. Only if it is deemed that there are specific local circumstances that warrant additional policy to control development in the countryside should it be included in the plan.

**Table 55 Comments on Question 18**

Name/ Agent	ID/ Type	Summary
Cooke (Holme Parish Council)	<b>1952</b> Observations	Visual impact, sustainability, projection of long term need, lack of other alternative, access to services
Andrew Pym	<b>1990</b> Object	Economic viability is important to the countryside and must be taken into account. Sustainability has three parts - economic, environmental and social, and government advice states that they are of equal value.
Church Commissioners <i>Ian Smith (Smiths Gore)</i>	<b>2022</b> Observations	A flexible approach is required and each development proposal must be considered individually.
John Blackburn (Little Paxton Parish Council)	<b>2671</b> Observations	Policy will be directed by national guidance
Stephen Dartford (Fenstanton Parish Council)	<b>2708</b> Support	Support
Andy Chapman (Luminus)	<b>2794</b> Observations	Not just agricultural but needs based
Andy Chapman (Luminus)	<b>2815</b> Observations	Would like to see an ACRE survey as part of any housing application in rural areas
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	<b>2996</b> Observations	Housing for agricultural workers should be assessed on the relative need and provided in accordance with PPS7. Criteria should assess the need with regards to the business rather than the preferences of the employee.
P Blewett (Somersham Parish Council)	<b>3300</b> Observations	Meets housing stock needs locally. Specifically should provide "affordable housing". Where the need is identified as acute, high levels of "affordable housing" should be specified (i.e. 80/100%). Should blend in with the local street scene where relevant. Should retain traditional features in local design. No impact on biodiversity. Zero or negative carbon footprint. No impact on vistas and views

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
Janet Innes-Clarke (Brampton Parish Council)	4149 Observations	Major development (60 or more) should not be permitted except in market towns. Housing for agricultural workers – affordable houses are necessary

**Table 56 Comments on Question 19**

Name/ Agent	ID/ Type	Summary
Church Commissioners <i>Ian Smith (Smiths Gore)</i>	2021 Support	Housing specifically for the elderly should be allowed in a wider choice of locations.
Ian Stapleton (Great & Little Gidding Parish Council)	2051 Support with conditions	Elderly homes are a separate case in that it is all affordable! If it fulfils planning requirements then is ok.
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2213 Observations	Should be judged on a case by case basis
John Chase (Buckden Parish Council)	2411 Support with conditions	Yes providing that the location has the services and facilities to support the residents
Martin Page (D H Barford + Co.)	2444 Object	Retirement housing should be provided in locations where general housing may not be acceptable.
Chris Blackman (Cambridgeshire County Council)	2535 Observations	Any retirement homes should be located within areas proven to have good public transport accessibility to key services.
John Blackburn (Little Paxton Parish Council)	2672 Support	Yes, to ensure local people remain in the local location rather than be placed in a new area when they have reached retirement. Transport links to these areas must reflect the need of the elderly residents.
Stephen Dartford (Fenstanton Parish Council)	2709 Support with conditions	Yes. Health care, transport, social services and community support services must be provided.
Andy Chapman (Luminus)	2795 Support	Support
Stonecheck plc <i>Valerie Colby (John Martin Associates)</i>	2846 Observations	Policies must allow for a flexible approach to providing housing for the elderly population.
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	2997 Support with conditions	Yes, but where possible retirement housing should also form the basis of a mixed community as advocated in PPS1 and PPS3. The Housing should also be located close to services and facilities that people of retirement age require.
P Blewett (Somersham Parish Council)	3302 Object	Object
Janet Innes-Clarke (Brampton Parish Council)	4150 Observations	Needs to be small to medium in size and situated so as to be part of the community in general

**Table 57 Comments on Question 20**

Name/ Agent	ID/ Type	Summary
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2215 Observations	Shop, community facility, public transport
John Chase (Buckden Parish Council)	2412 Observations	Health Centre, good transport links & social services.

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
Martin Page (D H Barford + Co.)	2449 Observations	Medical care, social and leisure facilities, access to public or shared transport. These can all be provided within purpose built developments.
Chris Blackman (Cambridgeshire County Council)	2538 Observations	Regular bus services and areas, which are covered by good community transport, are crucial services that are required to support elderly residents.
John Blackburn (Little Paxton Parish Council)	2673 Observations	Doctors, convenience store but most of all access via regular public transport to market towns and facilities such as Hospitals.
Stephen Dartford (Fenstanton Parish Council)	2710 Observations	Health care, transport, social services and community support services.
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	2998 Observations	Doctors, Restaurants, Dentists, Post Offices, Cafes, Shops, Supermarkets, Efficient Public Transport – to a range of locations. Leisure Facilities/Activities all within a walkable distance.
P Blewett (Somersham Parish Council)	3304 Observations	Local staff, Public transport, Roads of a suitable capacity, Shops, Local library

**Table 58 Comments on Question 21**

Name/ Agent	ID/ Type	Summary
Church Commissioners <i>Ian Smith (Smiths Gore)</i>	2020 Support	Support
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2216 Observations	No should be judged on a case by case basis
John Chase (Buckden Parish Council)	2413 Support with conditions	Support in principle
Martin Page (D H Barford + Co.)	2446 Object	Nursing and care homes should be provided in locations where general housing may not be acceptable.
John Blackburn (Little Paxton Parish Council)	2674 Support	Yes, to ensure local people remain in the local location rather than be placed in a new area when they have reached retirement. Transport links to these areas must reflect the need of the elderly residents.
Stephen Dartford (Fenstanton Parish Council)	2711 Observations	Yes. Health care, transport, social services and community support services must be provided.
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	2999 Support with conditions	Yes, but where possible care and nursing homes should also form the basis of a mixed community as advocated in national planning policies. These homes should be located in close proximity to facilities and services required by residents and employees.
P Blewett (Somersham Parish Council)	3305 Object	Object
Ian Burns (Cambridgeshire PCT)	3528 Object	No, unless supporting infrastructure and services are in place or could be put in place
Janet Innes-Clarke (Brampton Parish Council)	4151 Observations	Needs to be small to medium in size and maybe 'attached' administratively and physically to retirement homes.

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**Table 59 Comments on Question 22**

Name/ Agent	ID/ Type	Summary
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2217 Observations	shop, medical facilities, public transport
John Chase (Buckden Parish Council)	2414 Observations	Health Centre, transport and social services.
Martin Page (D H Barford + Co.)	2450 Observations	Medical care, social and leisure facilities, access to public or shared transport
John Blackburn (Little Paxton Parish Council)	2675 Observations	Doctors, convenience store but most of all access via regular public transport to market towns and facilities such as Hospitals.
Stephen Dartford (Fenstanton Parish Council)	2712 Observations	Health care, transport, social services and community support services.
P Blewett (Somersham Parish Council)	3306 Observations	Local staff, Public transport, Roads of a suitable capacity, Shops, Local library
Ian Burns (Cambridgeshire PCT)	3529 Observations	A range of health and social care services is essential.

**Table 60 Comments on Question 23**

Name/ Agent	ID/ Type	Summary
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2218 Observations	No
John Chase (Buckden Parish Council)	2415 Support	Yes if para. 4.20 is given sufficient weight.
John Blackburn (Little Paxton Parish Council)	2676 Observations	National guidance.
Stephen Dartford (Fenstanton Parish Council)	2713 Observations	A national criteria is being developed
Andy Chapman (Luminus)	2796 Support	Support
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	3001 Support	Yes, in order to meet the identified accommodation needs and working patterns
P Blewett (Somersham Parish Council)	3311 Support with conditions	The criteria used can work if properly enforced. Sites should be arranged in such a way that travellers and show people do not become dominant over an environment or community.

**Table 61 Comments on Question 24**

Name/ Agent	ID/ Type	Summary
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2219 Observations	Location
John Blackburn (Little Paxton Parish Council)	2677 Observations	National guidance.
Stephen Dartford (Fenstanton Parish Council)	2714 Observations	National criteria are being developed.



# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
Andy Chapman (Luminus)	2797 Observations	A strong sustainable management procedure to be approved as part of planning.
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	3003 Observations	Criteria should follow advice in PPS3. Consideration should be given to the proximity to facilities, services and public transport; the proposals should not impose on the open countryside, or affect its character.
P Blewett (Somersham Parish Council)	3312 Observations	The criteria used can work if properly enforced. Sites should be arranged in such a way that travellers and show people do not become dominant over an environment or community.

**Table 62 Comments on Option 25**

Name/ Agent	ID/ Type	Summary
Landmatch Ltd & Oxford University C (Landmatch Ltd & Oxford University Chest) <i>Andrew Hodgson (Savills)</i>	2083 Support	Support. The provision of mixed developments which bring together residential and employment communities would seek to address the Government's aim to promote and create safely inclusive communities.
Colin Bambury (Highways Agency)	2345 Support	Support - Mixed use development is promoted in national guidance as a way of reducing the need to travel between home, work, and services, thus helping to create a sustainable community.

**Table 63 Comments on Issue 24**

Name/ Agent	ID/ Type	Summary
Chris Blackman (Cambridgeshire County Council)	2541 Object	Would like to see the phrase "Protect and enhance open spaces" used.

**Table 64 Comments on Option 26**

Name/ Agent	ID/ Type	Summary
Louise Lovegrove (DLP Planning Ltd) <i>Louise Lovegrove (DLP Planning Ltd)</i>	2101 Support	Support proposals to retain and expand open spaces within and accessible to settlements. We consider that the allocation of strategic scale development can better provide usable, new open spaces and recreational opportunities as part of a comprehensive development scheme.
Philip Raiswell (Sport England)	2335 Observations	Support the proposal to protect existing sport and recreation facilities but feel that the document also requires a policy to support the provision of new facilities or the enhancement of existing facilities if appropriate.
Chris Blackman (Cambridgeshire County Council)	2543 Observations	The text here is a little narrow in scope. It should encompass the principles behind the landscape scale habitat creation projects and GI strategy. Reference to possible mechanisms for delivery should be made. A criteria-based approach is preferable.
P Moore <i>Peter Moore (Henry H Bletsoe &amp; Son)</i>	2920 Observations	The current system of identifying and designating open space is preferable. A criteria-based policy would be too subjective. Where land is not currently designated as protected open space but deemed worthy of protection policies on conservation areas should provide an adequate policy framework.

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**Table 65 Comments on Question 25**

Name/ Agent	ID/ Type	Summary
Rachel Pateman (The Wildlife Trust)	1965 Observations	Those areas of open space that are known about should be identified and protected. This should be backed up with criteria-based policies
Pat Dillon (Toseland Parish Council)	2005 Observations	Given the stated difficulties with identifying on the Proposals Map all of the possible green spaces to be protected, a criteria based approach would probably give local people more chance to protect their own small green open spaces.
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2220 Observations	Criteria based policy would be better so that no important open spaces are overlooked in a mapping exercise
Philip Raiswell (Sport England)	2333 Support	Support the criteria based approach to protecting open space, though recommend a specific policy is required to protect playing fields as they are subject to very specific guidance within PPG17 in relation to exceptions where development may be permitted on playing fields.
John Chase (Buckden Parish Council)	2417 Observations	Would prefer all open spaces to be identified and designated.
John Blackburn (Little Paxton Parish Council)	2678 Observations	Criteria based policy
Stephen Dartford (Fenstanton Parish Council)	2715 Support	Yes. We prefer all open spaces to be identified and designated
Daniel Heenan <i>Julia Foster (David Lock Associates)</i>	2768 Object	An absolute restriction on the development of open spaces is inappropriate. Other plan objectives may occasionally carry priority and justify the loss of open space. Circumstances may also arise where some open space is lost but net benefit arises as a result of re-provision elsewhere, investment in/maintenance of or improved access to other open space.
Andy Chapman (Luminus)	2798 Observations	Criteria based
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	3008 Observations	Open spaces should be designated on the relevant proposals map. However criteria based approach prior to their designation should assess the merits, value and use of the space in order to justify its provision.
P Blewett (Somersham Parish Council)	3314 Observations	All such spaces should be identified and designated
Chantal Hagen (Natural England)	3480 Observations	Criteria-based policy
Janet Innes-Clarke (Brampton Parish Council)	4152 Observations	Small open spaces within developments should be planned to promote a feeling of well-being in dense housing.

**Table 66 Comments on Access to Services and Transport**

Name/ Agent	ID/ Type	Summary
Ian Stapleton (Great & Little Gidding Parish Council)	2057 Observations	Where is the public transport in villages?
Lionel Thatcher (Kimbolton & Stonely Parish Council)	2818 Support	Strongly support the objectives in this section

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**Table 67 Comments on Issue 25**

Name/ Agent	ID/ Type	Summary
Neil Ireland (Southoe and Midloe Parish Council)	1968 Support	Why not improving or enhancing facilities in villages, not 'preventing the loss'?
Louise Lovegrove (DLP Planning Ltd) <i>Louise Lovegrove (DLP Planning Ltd)</i>	2102 Observations	Use of social and community facilities, particularly retail and leisure, evolve through time and with the availability of competing alternatives and greater accessibility. Concentration of development in key locations and more sustainable centres likely to best ensure the maintenance of a high standard of services and facilities for the majority of population.
Stephen Dartford (Fenstanton Parish Council)	2716 Observations	It is essential all key services are maintained, specifically transport

**Table 68 Comments on Option 28**

Name/ Agent	ID/ Type	Summary
Neil Ireland (Southoe and Midloe Parish Council)	1969 Support	The appropriate and safe location of cycle parking is fundamental.
Louise Lovegrove (DLP Planning Ltd) <i>Louise Lovegrove (DLP Planning Ltd)</i>	2103 Support with conditions	Different standards of parking are likely to be required in different locations and for different types of housing.
Colin Bambury (Highways Agency)	2346 Support	Support
Paul Cronk (HBF)	2759 Object	Does not adhere with Government policy, which seeks to provide and promote alternative transportation modes to the car, but acknowledges that adequate car parking provision will still be necessary to meet homeowners' needs in respect of some journeys.

**Table 69 Comments on Question 26**

Name/ Agent	ID/ Type	Summary
R N Good, S J Good, S Leck <i>Simon Richardson (John Martin &amp; Associates)</i>	1974 Observations	There must sufficient flexibility within the application of car parking standards to recognise the inherent differences between 'town and country' and to avoid uncharacteristic and inappropriate 'urban' forms of development in rural areas.
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2221 Observations	The standards do not account for settlements with poor public transport and therefore higher car dependency. The maximum standard should be a minimum in these cases.
D R Juggins <i>Simon Richardson (John Martin &amp; Associates)</i>	2331 Observations	There must sufficient flexibility within the application of car parking standards to recognise the inherent differences between 'town and country' and to avoid uncharacteristic and inappropriate 'urban' forms of development in rural areas.
Stamford Homes <i>Jane Gardner (Smith Stuart Reynolds)</i>	2338 Object	Interim Car Parking Standards accompanying the Huntingdonshire Local Plan were produced in August 2001 they are therefore outdated and should not be used as a basis for producing new Car Parking and Cycle Parking Standards. Should follow advice in PPS3.
Lenton Trustees (L019) <i>Simon Richardson (John Martin &amp; Associates)</i>	2349 Observations	There must sufficient flexibility within the application of car parking standards to recognise the inherent differences between 'town and

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
		country' and to avoid uncharacteristic and inappropriate 'urban' forms of development in rural areas.
John Chase (Buckden Parish Council)	2418 Support	Support
Martin Page (D H Barford + Co.)	2451 Object	Yes
Chris Blackman (Cambridgeshire County Council)	2546 Support	We agree with the current approach that is used to determine car parking and cycle parking standards.
C M Convine (Ref C188) <i>Simon Richardson (John Martin &amp; Associates)</i>	2651 Object	There must be sufficient flexibility within the application of car parking standards to recognise the inherent differences between 'town and country' and to avoid uncharacteristic and inappropriate 'urban' forms of development in rural areas.
John Blackburn (Little Paxton Parish Council)	2679 Support	Yes
Stephen Dartford (Fenstanton Parish Council)	2718 Support	Yes
Andy Chapman (Luminus)	2801 Observations	Should be looked at on a scheme by scheme basis
Lord De Ramsey <i>Jenny Thomas (John Martin &amp; Associates)</i>	2826 Observations	There must sufficient flexibility within the application of car parking standards to recognise the inherent differences between 'town and country' and to avoid uncharacteristic and inappropriate 'urban' forms of development in rural areas.
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	3010 Observations	Interim car parking standards should be in accordance with the guidance in PPS3 and PPS6.
C Behagg <i>Simon Richardson (John Martin &amp; Associates)</i>	3076 Observations	There must sufficient flexibility within the application of car parking standards to recognise the inherent differences between 'town and country' and to avoid uncharacteristic and inappropriate 'urban' forms of development in rural areas.
Elton Estates (Ref E061) <i>Jenny Thomas (John Martin &amp; Associates)</i>	3091 Observations	There must sufficient flexibility within the application of car parking standards to recognise the inherent differences between 'town and country' and to avoid uncharacteristic and inappropriate 'urban' forms of development in rural areas.
P Blewett (Somersham Parish Council)	3316 Support	Yes
Janet Innes-Clarke (Brampton Parish Council)	4154 Observations	More car parking is needed at the rail station, 2 storeys would be possible at or near present site without being visually intrusive or taking up more land. Safe cycle parking would be useful. Preserving and enhancing Rights of Way is important if we are to embrace this non-motorised way of life.

**Table 70 Comments on Issue 27**

Name/ Agent	ID/ Type	Summary
Thornhill Estates <i>Andrew Hodgson (Savills)</i>	2066 Support	The network of footpaths and cycleways should be enhanced to provide a link between each of the major environmental enhancement schemes within the district.

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**Table 71 Comments on Question 27**

Name/ Agent	ID/ Type	Summary
Sandra Mitcham (Holywell-cum-Needlingworth Parish Council)	2222 Observations	0.5ha or 500 sq metres
Martin Page (D H Barford + Co.)	2452 Observations	The Council should adopt the DCLG definition for major development.
John Blackburn (Little Paxton Parish Council)	2680 Observations	Lower threshold of 500m2
Andy Chapman (Luminus)	2802 Observations	Lower
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	3013 Object	Threshold should be in alignment with the DCLG definition, however in smaller settlements the lower threshold would be appropriate in order to respect the local context.
R H Topham <i>Valerie Colby (John Martin Associates)</i>	3112 Observations	Prefers the DCLG definition. Developments under this threshold would not then have to adopt the sequential approach to location.
P Blewett (Somersham Parish Council)	3318 Object	This is a fundamentally flawed proposition. The generation of local employment must of necessity reduce average mileage and journey times. The same criteria should thus be applied to all development
Janet Innes-Clarke (Brampton Parish Council)	4156 Observations	Huntingdonshire should retain its rural/small-town character. To reduce the need to travel long distances medium-sized offices and light industry could be in our market towns.

**Table 72 Comments on Issue 29**

Name/ Agent	ID/ Type	Summary
Ian Stapleton (Great & Little Gidding Parish Council)	2062 Observations	Expansion of manufacturing areas is a good thing to encourage.

**Table 73 Comments on Option 31**

Name/ Agent	ID/ Type	Summary
Katherine Fletcher (English Heritage)	4172 Observations	Tourism development should also seek to conserve the historic environment

**Table 74 Comments on Question 28**

Name/ Agent	ID/ Type	Summary
Sandra Mitcham (Holywell-cum-Needlingworth Parish Council)	2223 Observations	0.5 ha or 500 sq metres
Martin Page (D H Barford + Co.)	2453 Object	The Council should adopt the DCLG definition for major development.
John Blackburn (Little Paxton Parish Council)	2681 Observations	Lower threshold of 500m2
Andy Chapman (Luminus)	2803 Observations	Lower

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
C Behagg <i>Simon Richardson (John Martin &amp; Associates)</i>	2848 Observations	Prefer the DCLG definition
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	3014 Observations	Agree with option 31. Office development should not be restricted so that it becomes unattractive to international and national firms and provision should be made in the larger town in order to attract such investment.
P Blewett (Somersham Parish Council)	3319 Object	This is a fundamentally flawed proposition. The generation of local employment must of necessity reduce average mileage and journey times. The same criteria should thus be applied to all development

**Table 75 Comments on Issue 30**

Name/ Agent	ID/ Type	Summary
Ian Stapleton (Great & Little Gidding Parish Council)	2060 Observations	The ratio is good and as the area develops this ratio should be maintained.
Paul Cronk (HBF)	2760 Observations	The Council will need to ensure that it balances the protection of employment sites with the need to ensure that appropriate re-development takes place where required

**Table 76 Comments on Question 29**

Name/ Agent	ID/ Type	Summary
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2224 Support	Support
L.J.A Miers & Co Ltd (L.J.A Miers & Co Ltd) <i>Anoushka Knight (Bidwells)</i>	2632 Object	We do not object to the inclusion of a policy which seeks to prevent the loss of employment/job opportunities in an area. However, we would object to a policy which sought rigidly to protect employment areas against redevelopment for other uses. There will be instances where the nature of employment areas will change over time, responding to market demands. For example, in those instances where the market demands a greater intensity of use (primarily entailing a change from storage and distribution or industrial uses to offices), flexibility is required to allow enabling forms of development and mixed uses. The drafting of the policy relating to existing employment areas should take a criteria based approach- one which does not preclude mixed use redevelopments and focuses upon the retention of job opportunities.
Lely (UK) Ltd <i>Anoushka Knight (Bidwells)</i>	2646 Object	We do not object to the inclusion of a policy which seeks to prevent the loss of employment/job opportunities in an area. However, we would object to a policy which sought rigidly to protect employment areas against redevelopment for other uses. There will be instances where the nature of employment areas will change over time, responding to market demands. For example, in those instances where the market demands a greater intensity of use (primarily entailing a change from storage and distribution or industrial uses to offices), flexibility is required to allow enabling forms of development and mixed uses. The drafting of the policy relating to existing employment areas should take a criteria based approach- one which does not preclude mixed use redevelopments and focuses upon the retention of job opportunities.
John Blackburn (Little Paxton Parish Council)	2682 Support	Support

# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
Stephen Dartford (Fenstanton Parish Council)	2717 Support	Support
Andy Chapman (Luminus)	2805 Support with conditions	Yes but they should include the ability to change use if demand is not proven
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	3018 Support with conditions	Agree however long term redundant employment sites should be re-assessed and if there is need for employment the land should be revaluated in order to provide mixed use development.
P Blewett (Somersham Parish Council)	3320 Object	This is irrational. Either there will be demands for proving employment or there will not. Policy can only determine that demand be met, cannot create demand where there is none, which underpins the rationale of this question.

**Table 77 Comments on Question 30**

Name/ Agent	ID/ Type	Summary
Sandra Mitcham (Holywell-cum-Needingworth Parish Council)	2225 Observations	0.5 ha or 500 sq metres
John Blackburn (Little Paxton Parish Council)	2683 Observations	Lower threshold
Andy Chapman (Luminus)	2806 Observations	Lower
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	3021 Observations	A range of sizes of land designated for employment should be protected in order to meet the needs of local and national and international firms. This should be dependent on the locality, dependent on the need for employment land vs. the need for housing.
P Blewett (Somersham Parish Council)	3321 Object	This is irrational. Either there will be demands for proving employment or there will not. Policy can only determine that demand be met; it cannot create demand where there is none which underpins the rationale of this question.

**Table 78 Comments on Issue 31**

Name/ Agent	ID/ Type	Summary
Thornhill Estates <i>Andrew Hodgson (Savills)</i>	2070 Support	Support
Daniel Heenan <i>Julia Foster (David Lock Associates)</i>	2764 Observations	Support the broad thrust of policy but need for caution in defining a threshold for major tourism projects which are diverse in nature and the quantity of built development will rarely reflect the intensity of use. Some recreation/tourism facilities will have to be located in the countryside because they relate to fixed, natural attractions. A significant proportion of trips in the countryside are likely to be car based and offer little scope for modal shift.
Katherine Fletcher (English Heritage)	4173 Observations	Tourism development should also seek to conserve the historic environment

# Appendix 1 Comments Received Summer 2007

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**Table 79 Comments on Option 33**

Name/ Agent	ID/ Type	Summary
Thornhill Estates <i>AndrewHodgson (Savills)</i>	2092 Support	Support
Jockey Club Racecourses (Jockey Club Racecourses) <i>DavidBarker (Barton Willmore)</i>	2960 Object	Object to paragraph 8.15. The policy should be clear that the expansion of existing tourist businesses should not be constrained by their location to the point where they cannot function, and should recognise that while facilities are located within the countryside they are often major business and tourist attractions and should be afforded more opportunity to be developed while maintaining environmental quality and countryside character than other less significant tourist facilities within the countryside.

**Table 80 Comments on Question 31**

Name/ Agent	ID/ Type	Summary
Sandra Mitcham (Holywell-cum-Needlingworth Parish Council)	2226 Observations	0.5ha or 500 sq metres
UKLI Ltd <i>ValerieColby (John Martin Associates)</i>	2328 Object	To determine a threshold in a policy context would be inappropriate and each development should be considered on an individual basis.
John Blackburn (Little Paxton Parish Council)	2684 Observations	500m2
Stephen Dartford (Fenstanton Parish Council)	2719 Observations	Support option 33
Andy Chapman (Luminus)	2807 Observations	Lower
Persimmon Homes Ltd <i>HannahTrubshaw (Pegasus Planning Group)</i>	3024 Observations	Threshold should follow the DCLG definition dependent on the location, access to facilities and services, access to the road network, access to other attractions from the site.
P Blewett (Somersham Parish Council)	3323 Object	No thresholds should be used - an arbitrary allocation of size to over write policy is irrational and will lead to a suboptimal decision

**Table 81 Comments on Question 32**

Name/ Agent	ID/ Type	Summary
Andrew Pym	1991 Object	Such development of greenfield land should be permitted where a well-founded diversification proposal requires it, whether or not it includes existing buildings as well. Too strict an approach will limit many good schemes, but each should be assessed on its merits.
Church Commissioners <i>IanSmith (Smiths Gore)</i>	2019 Support	Farm diversification should be allowed on previously undeveloped land in order to protect and enhance the viability of farm operations.
Sandra Mitcham (Holywell-cum-Needlingworth Parish Council)	2227 Object	Object
John Blackburn (Little Paxton Parish Council)	2685 Object	Object
Andy Chapman (Luminus)	2809 Support	Support



# Comments Received Summer 2007 Appendix 1

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Name/ Agent	ID/ Type	Summary
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	3027 Support	Yes, in accordance with PPS3.
P Blewett (Somersham Parish Council)	3324 Observations	If the objectives identified in this document are identified assessed and scored and a development can be shown to meet those objectives, it should be allowed wherever the development happens to be.

**Table 82 Comments on Question 33**

Name/ Agent	ID/ Type	Summary
Sandra Mitcham (Holywell-cum-Needlingworth Parish Council)	2228 Support	Support
Martin Page (D H Barford + Co.)	2455 Observations	Yes. However, these should be properly assessed having regard to commercial considerations such as rental values.
John Blackburn (Little Paxton Parish Council)	2686 Support	Support
Stephen Dartford (Fenstanton Parish Council)	2720 Support	Support
Andy Chapman (Luminus)	2810 Support	Support
Persimmon Homes Ltd <i>Hannah Trubshaw (Pegasus Planning Group)</i>	3029 Support	Support
P Blewett (Somersham Parish Council)	3325 Object	Policy should have nothing to do with this. That is the best way of creating an urban wasteland where policy decrees a use for a site but no one wishes to develop it that way as there is no market need.

**Table 83 Comments on Issue 34**

Name/ Agent	ID/ Type	Summary
Ian Stapleton (Great & Little Gidding Parish Council)	2061 Support	Support

**Table 84 Comments on Option 36**

Name/ Agent	ID/ Type	Summary
Jockey Club Racecourses (Jockey Club Racecourses) <i>David Barker (Barton Willmore)</i>	2961 Observations	A criterion based policy setting out a sequential approach to the location of major and minor retail and leisure development should recognise the location and business requirements of leisure facilities and should not restrict expansion or development of necessary facilities.

**Table 85 Comments on Option 37**

Name/ Agent	ID/ Type	Summary
Carolyn Wilson (Mobile Operators Association) <i>Carolyn Wilson (Mobile Operators Association)</i>	2590 Support with conditions	The Mobile Operators Association would support a balanced criteria based policy for telecommunications which was in accordance with the provisions of PPG8 and which supported the growth of such development whilst safeguarding the environment from visually intrusive development.

# Appendix 2 Evidence Base and Supporting Documents

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

## Appendix 2 Evidence Base and Supporting Documents

2.1 National sources? - not in library list.

**Table 86 Regional Planning References**

Code	Title
REG1	<a href="#">The East of England Plan (GO-East, 2008)</a>
REG2	<a href="#">EERA response to Core Strategy conformity consultation (EERA, 2008)</a>

**Table 87 Local Planning References**

Code	Title
LOC1	<a href="#">Cambridgeshire and Peterborough Structure Plan (Cambs CC, 2003)</a>
LOC2	<a href="#">Huntingdonshire Local Plan Part One (HDC, 1995)</a>
LOC3	<a href="#">Huntingdonshire Local Plan Part Two (Proposals Map) (1995)</a>
LOC4	<a href="#">Huntingdonshire Local Plan Alteration (2002)</a>
LOC9	<a href="#">Sustainability Appraisal - Scoping Report (HDC, 2005)</a>
LOC10	<a href="#">Sustainability Appraisal - Scoping Report (HDC, 2007)</a>
LOC14	<a href="#">Final Sustainability Appraisal on the submission Core Strategy 2008 (HDC, 2008)</a>
LOC15	<a href="#">Statement of Consultation for the submission Core Strategy 2008 (HDC, 2008)</a>
LOC16	<a href="#">Annex 1 to the Statement of Consultation: Audit Trail (HDC, 2008)</a>
LOC18	<a href="#">Annex 2 to the Statement of Consultation: Soundness Self Assessment (HDC, 2008).</a>
LOC19	<a href="#">Local Development Scheme (HDC, 2007)</a>
LOC20	<a href="#">Development Management DPD: Development of Options 2009 (HDC, 2009)</a>
LOC21	<a href="#">Draft Final Sustainability Appraisal for Development Management DPD: Development of Options (HDC, 2009)</a>
LOC22	<a href="#">Developer Contributions Towards Affordable Housing SPD (HDC, 2007)</a>
LOC23	<a href="#">Ramsey Gateway Urban Design Framework (HDC, 2004)</a>
LOC24	<a href="#">A Vision for St Ives (Civic Trust, 2003)</a>
LOC25	<a href="#">A Vision for St Neots (Civic Trust, 2004)</a>
LOC26	<a href="#">A Vision for Huntingdon (Civic Trust, 2006)</a>
LOC27	<a href="#">Annual Monitoring Report (HDC, 2008)</a>
LOC30	<a href="#">Huntingdonshire Local Plan Proposals Map Inset Plans Saved Policies (HDC, 2008)</a>

# Evidence Base and Supporting Documents Appendix 2

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Code	Title
LOC35	Huntingdonshire Core Strategy (HDC 2009)
LOC36	<a href="#">Huntingdon Conservation Area Character Assessment</a>
LOC37	Huntingdon Town Centre – A Vision and Strategy for Growth and Quality (Civic Trust 2000) <a href="#">Sections 1 &amp; 2</a> , <a href="#">Sections 3 &amp; 4</a> , <a href="#">Section 5</a> and <a href="#">Section 6</a>
LOC38	<a href="#">West of Town Centre Urban Design Framework (Civic Trust 2002)</a>
LOC39	Hinchingbrooke House Huntingdon: An Assessment of the Historic Landscape (Tom Williamson, Sarah Harrison 2006) Not on web – please ask for a copy
LOC40	<a href="#">Land Drainage Byelaws (Alconbury and Ellington Drainage Board 1993)</a>

**Table 88 Sustainable Development References**

Code	Title
SUS1	<a href="#">Huntingdonshire Community Strategy (HDC, 2004)</a>
SUS2	<a href="#">Huntingdonshire Sustainable Community Strategy (HDC, 2008)</a>
SUS3	<a href="#">Huntingdonshire Landscape and Townscape Assessment SPD (HDC 2007)</a>
SUS4	<a href="#">Huntingdonshire Design Guide SPD (HDC, 2007)</a>
SUS5	<a href="#">Environment Strategy (HDC, 2008)</a>
SUS6	<a href="#">Statement of Community Involvement (HDC, 2006)</a>
SUS7	<a href="#">Sustainable Construction in Cambridgeshire - A Good Practice Guide (Cambridgeshire Horizons and Cambs CC, 2006)</a>
SUS8	<a href="#">Climate Change and Environment Strategy (Cambs CC, 2008)</a>
SUS9	<a href="#">Statement on behalf of MOD with regard to RAF Brampton (Defence Estates, 2009)</a>
SUS10	Economic Impact of Tourism Huntingdonshire District 2007 (East of England Tourism, 2007)
SUS12	<a href="#">Growing Success (HDC, 2008)</a>
SUS13	<a href="#">Local Area Agreement 2008-2011 (Cambridgeshire Together, 2007)</a>
SUS14	<a href="#">Cambridgeshire's Vision 2007-2021 Countywide Sustainable Community Strategy (Cambridgeshire Together, 2008)</a>

**Table 89 Housing References**

Code	Title
HOU3	<a href="#">Huntingdonshire Housing Strategy 2006 - 2011 (HDC, 2006)</a>
HOU4	<a href="#">Cambridge Housing Sub Region Strategic Housing Market Assessment (Cambridgeshire Horizons, 2008)</a>
HOU5	<a href="#">Peterborough Sub-Regional Strategic Housing Market Assessment (Peterborough CC, 2008)</a>

# Appendix 2 Evidence Base and Supporting Documents

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Code	Title
HOU7	<a href="#">Huntingdonshire Strategic Housing Land Availability Assessment (HDC, 2008)</a>
HOU8	<a href="#">Huntingdonshire Settlement Hierarchy Background Paper Update (HDC, 2007)</a>

**Table 90 Employment References**

Code	Title
EMP1	<a href="#">Employment Land Review (Warwick Business Management Ltd on behalf of HDC, 2007)</a>
EMP2	<a href="#">Huntingdonshire Local Economy Strategy 2008 - 2015 (HDC, 2008)</a>
EMP3	<a href="#">Employment in the Hi-tech "Community" Cambridgeshire and Peterborough 2006 (CCC, 2006)</a>

**Table 91 Retail References**

Code	Title
RET1	<a href="#">Huntingdonshire Retail Assessment Study (Roger Tym and Partners on behalf of HDC, 2005)</a>
RET2	<a href="#">Huntingdonshire Retail Assessment Study Update (Roger Tym and Partners on behalf of HDC, 2007)</a> <a href="#">Huntingdonshire Retail Assessment Study Update (Roger Tym and Partners on behalf of HDC, 2007) Appendices</a>
RET3	Huntingdonshire Retail Study Report (CB Hillier Parker on behalf of HDC, 2001)

**Table 92 Strategic Green Space References**

Code	Title
SGS1	<a href="#">50 Year Wildlife Vision for Cambridgeshire and Peterborough (Cambs CC, 2002)</a>
SGS2	<a href="#">Green Infrastructure Strategy (Cambridgeshire Green Vision) (Cambridgeshire Horizons, 2006)</a> <a href="#">Green Infrastructure Strategy (Cambridgeshire Green Vision) (Cambridgeshire Horizons, 2006) Map</a>
SGS3	<a href="#">Open Space, Sport and Recreation Needs Assessment (PNP on behalf of HDC, 2006)</a>
SGS4	<a href="#">Great Fen project brochure (Great Fen Partnership, 2006)</a>
SGS5	<a href="#">Habitats Regulations Assessment of the Huntingdonshire LDF Core Strategy (Scott Wilson Ltd on behalf of HDC, 2008)</a> <a href="#">Habitats Regulations Assessment of the Huntingdonshire LDF Core Strategy (Scott Wilson Ltd on behalf of HDC, 2008) Maps</a>
SGS6	<a href="#">Huntingdonshire Sports Facilities Standards Report (2008)</a>
SGS7	<a href="#">Cambridgeshire County Council Strategic Open Space Study (CCC 2004)</a>
SGS8	<a href="#">Cambridgeshire Green Vision Newsletter (CCC 2008)</a>
SGS9	Strategic Open Space User Survey (BMG for CCC, 2004) Not on web - please ask for a copy

# Evidence Base and Supporting Documents Appendix 2

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**Table 93 Infrastructure References**

Code	Title
INF4	<a href="#">Local Investment Framework Final Report, Appendices, Infrastructure Delivery Model (EDAW on behalf of HDC, 2009)</a>
INF5	<a href="#">Cambridgeshire Local Transport Plan 2006-2011 (Cambs CC, 2006)</a>
INF7	<a href="#">Highways Agency A14 Position Statement (Highways Agency, 2009)</a>
INF11	Huntingdonshire Strategic Flood Risk Assessment 2009 Update (Mott MacDonald on behalf of HDC, 2009)
INF12	Huntingdonshire Outline Water Cycle Strategy – Waste Water Treatment Summary (Faber Maunsell on behalf of HDC, 2009)
INF13	<a href="#">A14 Announcements (Highways Agency 2007-)</a>
INF14	<a href="#">Cambridge to Huntingdon Multi-Modal Study (EERA 2001)</a>
INF15	<a href="#">Huntingdon &amp; Godmanchester Market Town Transport Strategy (CCC &amp; HDC 2003)</a>
INF16	<a href="#">Car Parking Strategy and Action Plan 2008-2011 (HDC 2008)</a>
INF17	HWAAP Options Assessment Report (Atkins Transport Planning 2008) Not on web – please ask for a copy
INF18	Environmental Ground Investigation and Risk Assessment (QDS Environmental, 2001) Not on web – please ask for a copy
INF19	Huntingdon West Area Action Plan Preferred Option Draft Financial Viability Study (CBRE 2008) Not on web – please ask for a copy

# Appendix 3 Saved Policies

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

## Appendix 3 Saved Policies

**3.1** The following tables detail those policies from the Huntingdonshire Local Plan 1995 and the Huntingdonshire Local Plan Alteration 2002 which are currently saved<sup>(iii)</sup> that will be superseded by policies contained in the Development Management DPD (in line with Regulation 13(5)).

**Table 94 Saved policies from the Local Plan 1995 that are superseded by Development Management Policies**

Saved Policy	Superseded by
H11 'Housing in town centres'	No direct replacement
H12 'Housing redevelopment in town centres'	No direct replacement
H23 'Housing development outside environmental limits'	Homes in the Countryside
H24 'Agricultural dwellings'	Homes in the Countryside
H25 'Restrictive occupancy'	No direct replacement
H26 'Refurbishment of rural dwellings'	No direct replacement
H27 'Replacement dwellings in the countryside'	H 5 Homes in the Countryside
H28 'Replacement dwellings in the countryside (criteria for)'	H 5 Homes in the Countryside
H29 'Conversion of buildings in the countryside to dwellings'	P 8 Rural Buildings
H30 'Residential amenity protection'	H 7 Amenity
H31 'Residential privacy and amenity standards'	H 7 Amenity
H32 'Sub-division of large curtilages'	E 3 Heritage Assets
H33 'Sub-division of large curtilages (affecting protected buildings or features)'	E 3 Heritage Assets
H34 'Residential privacy and amenity for extensions'	H 7 Amenity
H35 'Tandem development'	H 7 Amenity
H37 'Housing and environmental pollution'	H 7 Amenity
H38 'Housing and noise pollution'	H 7 Amenity
H41 'Temporary use of residential caravans'	H 5 Homes in the Countryside
H43 'Hostels and homes'	H 4 Supported Housing

iii Those policies the Secretary of State for Communities and Local Government in the exercise of the power conferred by paragraph 1(3) of Schedule 8 to the Planning and Compulsory Act 2004 has directed, that for the purposes of the policies specified paragraph 1(2)(a) of Schedule 8 to the Planning and Compulsory Purchase Act 2004 does not apply.

# Saved Policies Appendix 3

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

<b>Saved Policy</b>	<b>Superseded by</b>
E1 'Promotion of economic and employment growth'	P 1 Large Scale Businesses P 2 Small Businesses P 3 Safeguarding Employment Areas
E2 'Range of employment sites'	P 1 Large Scale Businesses P 2 Small Businesses P 3 Safeguarding Employment Areas
E7 'Small businesses establishment or expansion'	P 2 Small Businesses
E8 'Small scale employment in villages'	P 2 Small Businesses
E10 'Re-use of rural buildings'	P 8 Rural Buildings
E11 'Expansion of existing firms'	P 2 Small Businesses
E15 'Special and heavy industries'	P 1 Large Scale Businesses
S2 'Location and design criteria for shopping proposals'	P 5 Local Shopping and Services
S7 'Local shopping proposals in existing residential areas'	P 5 Local Shopping and Services
S10 'Protection and enhancement of town centre viability and vitality'	P 4 Town Centre Uses and Retail Designations
S12 'Retention of existing retail units in town centres'	P 4 Town Centre Uses and Retail Designations
S13 'Primary shopping frontages of market towns'	P 4 Town Centre Uses and Retail Designations
S14 'A3 uses (food and drink) assessment criteria'	H 7 Amenity
S16 'Local shopping proposals in built up areas'	P 5 Local Shopping and Services
S17 'Retention of rural shopping facilities'	P 6 Protecting Local Services and Facilities
T18 'Access requirements for new development'	E 8 Sustainable Travel
T19 'Footpath provision in new development'	E 8 Sustainable Travel
T20 'Cycleway provision in new development'	E 8 Sustainable Travel
T24 'Car park allocations in Market Towns'	No direct replacement
R1 'Promotion and monitoring of recreation and leisure'	No direct replacement
R2 'Assessment criteria for new recreation facilities'	D 1 Green Space, Play and Sports Facilities Contributions
R3 'Minimum recreation open space provision standards'	D 1 Green Space, Play and Sports Facilities Contributions
R6 'Recreation provision in new developments in market towns'	D 1 Green Space, Play and Sports Facilities Contributions
R7 'Open playspace provision standards in new housing schemes'	D 1 Green Space, Play and Sports Facilities Contributions

# Appendix 3 Saved Policies

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

<b>Saved Policy</b>	<b>Superseded by</b>
R8 'Commutation of open playspace'	D 1 Green Space, Play and Sports Facilities Contributions
R11 'Recreational provision (or financial contributions) in non residential schemes'	D 1 Green Space, Play and Sports Facilities Contributions
R12 'Children's play areas'	D 1 Green Space, Play and Sports Facilities Contributions
R13 'Informal countryside recreation'	D 1 Green Space, Play and Sports Facilities Contributions
R15 'Public Rights of Way'	E 8 Sustainable Travel
R17 'Alternative development on recreation and amenity areas and school playing fields'	D 1 Green Space, Play and Sports Facilities Contributions
En1 'Demolition of listed buildings'	E 3 Heritage Assets
En2 'Character and setting of listed buildings'	E 3 Heritage Assets
En3 'Alternative uses for listed buildings'	E 3 Heritage Assets
En5 'Conservation areas character'	E 3 Heritage Assets
En6 'Design standards in conservation areas'	E 1 Development Context E 3 Heritage Assets
En7 'Outline applications in conservation areas and sites adjoining listed buildings'	E 3 Heritage Assets
En8 'Conservation area consent for demolition'	E 3 Heritage Assets
En9 'Open spaces, trees and street scenes in conservation areas'	E 5 Trees, Woodland and Hedgerows
En11 'Ancient monuments and archaeological sites'	E 3 Heritage Assets
En12 'Archaeological recording'	E 3 Heritage Assets
En13 'Archaeological potential evaluation'	E 3 Heritage Assets
En14 'Open spaces, frontages and gaps in the built up framework'	E 1 Development Context E 3 Heritage Assets
En15 'Open spaces and gaps identified for protection'	D 1 Green Space, Play and Sports Facilities Contributions
En16 'Frontages identified for protection'	E 3 Heritage Assets
En17 'Development in the countryside'	E 1 Development Context E 3 Heritage Assets P 7 Development in the Countryside
En18 'Protection of countryside features'	E 5 Trees, Woodland and Hedgerows
En19 'Tree preservation orders'	E 5 Trees, Woodland and Hedgerows



# Saved Policies Appendix 3

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Saved Policy	Superseded by
En20 'Landscaping schemes for new development'	E 1 Development Context
En22 'Nature and wildlife conservation'	E 4 Biodiversity and Protected Habitats and Species
En23 'Sites of Special Scientific Interest and national nature reserves'	E 4 Biodiversity and Protected Habitats and Species
En24 'Access provision for the disabled'	No direct replacement
En25 'General design criteria'	E 1 Development Context
EN27 'Shopfront design'	E 1 Development Context
En28 'Advertisements on listed buildings and in conservation areas'	E 3 Heritage Assets
En30 'Advertisement control'	H 7 Amenity
En32 'Design of road signs and street furniture'	E 1 Development Context E 3 Heritage Assets
To1 'Development of tourism opportunities'	P 10 Tourist Facilities and Attractions P 11 Water-based Tourism and Leisure P 12 Tourist Accommodation
To2 'New tourist facilities'	P 10 Tourist Facilities and Attractions P 11 Water-based Tourism and Leisure P 12 Tourist Accommodation
To3 'Re-use of rural buildings for tourism'	P 10 Tourist Facilities and Attractions P 11 Water-based Tourism and Leisure P 12 Tourist Accommodation
To7 'Adaptation of existing buildings for tourist accommodation'	P 10 Tourist Facilities and Attractions P 11 Water-based Tourism and Leisure P 12 Tourist Accommodation
To8 'New accommodation and conference centre locational criteria'	P 10 Tourist Facilities and Attractions P 11 Water-based Tourism and Leisure P 12 Tourist Accommodation
To9 'Caravan and camping sites'	P 10 Tourist Facilities and Attractions P 11 Water-based Tourism and Leisure P 12 Tourist Accommodation
To11 'Farm based tourism developments'	P 10 Tourist Facilities and Attractions P 11 Water-based Tourism and Leisure P 12 Tourist Accommodation
CS5 'Development of health and social care facilities'	P 5 Local Shopping and Services
CS6 'Improvements to library services'	P 5 Local Shopping and Services
CS8 'Water supply, sewerage, sewage disposal and surface water drainage requirements'	C 5 Flood Risk and Water Management

# Appendix 3 Saved Policies

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Saved Policy	Superseded by
CS9 'Flood water management'	C 5 Flood Risk and Water Management

**Table 95 Saved policies from the Local Plan Alteration 2002 that are superseded by Development Management Policies**

Saved Policy	Superseded by
HL4 'Estate-scale development at Ramsey'	No direct replacement
HL5 'Good design and layout'	E 1 Development Context
HL6 'Housing densities'	H 1 Efficient Use of Housing Land
HL10 'Meeting the range of housing needs'	H 2 Housing Mix

## Saved Structure Plan

**3.2** Saved Structure Plan policies can only be replaced in their entirety by policies in the relevant RSS, however the following Structure Plan policies are no longer considered to be materially relevant for Huntingdonshire. The identified policies will take precedence when considering planning applications.

**Table 96 Saved policies from the Cambridgeshire and Peterborough Structure Plan 2003 that are superseded by Development Management Policies**

Saved Policy	Superseded by
P2/5 Distribution, Warehousing & Manufacture	P 1 Large Scale Businesses P 3 Safeguarding Employment Areas
P4/4 Water-based Recreation	P13 Water-based Leisure

## Soundness Self Assessment

The Planning Inspectorate (PINS) publication, [Examining Development Plan Documents: Soundness Guidance](#), strongly urges councils to conduct a self-assessment using the soundness toolkit from the Planning Advisory Service. This annex is the self assessment for the Development Management DPD.

In an effort to keep this assessment concise, relevant evidence is hyperlinked rather than copying documents or sections in full. Wherever possible evidence is available to download from the Council's website, however in some cases this has not been possible, in which case reproductions of full documents or summaries are available from the Council.

**Table 97 Soundness Testing - Justified**

Key Question	Evidence
<b>1. Participation</b>	
Has the consultation process allowed for effective engagement of all interested parties?	This Statement of Consultation sets out the consultation process undertaken which has allowed for the effective engagement of all interested parties. In addition to the general consultation process there has been correspondence with interested parties at all stages of plan preparation.
<b>2. Research/ Fact Finding</b>	
Is the content of the development plan document justified by the evidence?  What is the source of the evidence?  How up to date and convincing is it?	The Development of Options 2009 set out how the evidence and the main findings of consultation supported the approach taken. Amendments to the approach have been documented in this Statement of Consultation, an updated list of evidence is included in Appendix 2 'Evidence Base and Supporting Documents' and detailed responses to individual representations can be found of the Council's <a href="#">Consultation Portal</a> . The Final Sustainability Appraisal supports the Proposed Submission document.
What assumptions had to be made in preparing the development plan document?  Are the assumptions reasonable and justified?	The preparation of the Development Management DPD has taken place in the context of the Core Strategy setting the strategic spatial planning framework (in turn influenced by higher order policies). The assumption was therefore that the Core Strategy would need to be complete prior to completion of the DPD. This was achieved with adoption of the Core Strategy in September 2009.  The LDF context was also relevant, and it has been assumed that other policies covering the Huntingdon West area will be set out in the Huntingdon West Area Action Plan, for which the next stage will be Submission. It has also been assumed that policies allocating sites for development will be set out in the Planning Proposals DPD, for which the next stage will be Issues and Options  The Final Sustainability Appraisal also includes information about the District, the key sustainability issues facing the District and baseline data and indicators.
<b>3. Alternatives</b>	

# Soundness Self Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Key Question	Evidence
<p>Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>This Statement of Consultation identifies the council's approach in relation to alternatives identified.</p> <p>The Issues and Options 2007 proposed separate objectives from those put in the Core Strategy which was not supported. For the Development of Options it was proposed to use the Vision and Objectives from the Core Strategy as the overarching strategy, which was supported.</p> <p>Throughout the development of the DPD the Council has endeavoured to identify reasonable alternatives. In many cases the choice has been between relying solely on national policy or drawing up a locally specific approach. Where evidence and consultation supports a locally specific approach and there are further reasonable options available these have been identified and considered. The Development of Options document set out where the Council had identified reasonable alternatives and the decisions in the relation to these.</p> <p>A number of policies have been developed since the Development of Options document and in those cases this Statement of Consultation sets out the considerations that went into the decisions to develop those policies.</p>
<p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<p>The Initial SA assessed how the original options and alternatives performed. It concluded that the selected options had different sustainability strengths but were on the whole sustainable. Where improvements were identified that would lead to more sustainable options these were included as recommendations.</p> <p>The Draft Final SA considered the sustainability of the draft policies put forward in the Development of Options document. It concluded that the draft policies were broadly sustainable but made recommendations for improvements.</p> <p>The Draft Final SA considered the sustainability of the draft policies put forward in the Development of Options document. It concluded that the policies were sustainable but made recommendations for improvements which were then incorporated into the policies before publication of the Proposed Submission plan.</p>
<p>Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p>There is a close relationship with the East of England Plan (EEP) policies and those in the Development Management DPD. For a number of topics the EEP identifies scope for local planning authorities to set out the approach that should be taken locally. An example of this is policy ENV6: The Historic Environment of the EEP which is supported by policy E 3 Heritage Assets in the Development Management DPD.</p> <p>The EEP sets out the regional approach to the hierarchy of settlements (specifically through policy SS4: Towns other than Key Centres and Rural Areas of relevance to Huntingdonshire) which is expanded upon locally through the Core Strategy in policy CS3 The Settlement Hierarchy. The settlement hierarchy is in turn used in several of the Development Management DPD policies reflecting the relative sustainability of different settlements.</p>

**Table 98 Soundness Testing - Effectiveness**

Key Question	Evidence
<b>Deliverable</b>	
<p>Has the council clearly identified what the issues are that the development plan document is seeking to address? Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<p>The vision and objectives from the Core Strategy are used as the over arching vision and objectives of the LDF. The Core Strategy was found sound and adopted in September 2009. As the Development Management DPD seeks to guide the form of development but does not allocate sites phasing and Implementation will be determined as and when planning applications are submitted in response to the requirements and criteria of the policies.</p>
<p>Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<p>No cross-boundary issues have been identified at any point in the consultation process.</p>
<p>Does the development plan document contain clear objectives?</p>	<p>The objectives from the Core Strategy are used as over arching objectives of the LDF. The Core Strategy was found sound and adopted in September 2009.</p>
<p>Are the objectives specific to the place; as opposed to being general and applicable to anywhere?  Is there a direct relationship between the identified issues and the objectives?</p>	<p>The objectives from the Core Strategy are used as over arching objectives of the LDF. The Core Strategy was found sound and adopted in September 2009. The objective are therefore specific to the place.</p>
<p>Is it clear how the policies will meet the objectives?  Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<p>For each policy information is provide about the objectives that will be progressed through its implementation. There are no gaps as delivery of all objectives is supported by at least one policy.</p>
<p>Are there realistic timescales related to the objectives?</p>	<p>As the Development Management DPD seeks to guide the form of development but does not allocate sites timescales will be determined as and when planning applications are submitted in response to the requirements and criteria of the policies.</p>
<p>Are the policies internally consistent?</p>	<p>The policies are internally consistent.</p>

# Soundness Self Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Key Question	Evidence
<p>Does the development plan document contain material which:</p> <p>is already in another plan</p> <p>should logically be in a different plan</p> <p>should not be in a plan at all?</p>	<p>The DPD expands upon a number of regional and strategic principles established in the EEP and the Core Strategy respectively. The policies do not repeat any content of other plans. The DPD has a clear roll within the LDF; the overall strategy is set out in the Core Strategy and the Planning Proposals DPD will set out allocations for development in accordance with that strategy, therefore the Development Management DPD is required to guide and direct the form of development proposals. There are a number of topics that consultation responses have argued should not be contained in the plan as they are adequately addressed by national or regional policy. The Council has sought to establish the basis for including policies addressing these topics where there are circumstances in Huntingdonshire that support a locally specific approach. In other circumstances the Council has resisted calls for policy coverage of topics or aspects of topics that are adequately covered by national or regional policy.</p>
<p>Does the development plan document explain how its key policy objectives will be achieved?</p>	<p>As the Development Management DPD seeks to guide the form of development but does not allocate sites the achievement of objectives is achieved incrementally through the determination of planning applications. For each policy information is provide about the objectives that will be progressed through its implementation.</p>
<p>If there are development management policies, are they supportive of the strategy and objectives?</p>	<p>The DPD expands upon the strategic principles established in the Core Strategy. For each policy information is provide about the objectives that will be progressed through its implementation.</p>
<p>Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<p>The DPD contains a series of policies (D 1 to 8) that address the infrastructure implications of development.</p>
<p>Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<p>As the Development Management DPD seeks to guide the form of development but does not allocate sites timescales will be determined as and when planning applications are submitted in response to the requirements and criteria of the policies.</p>
<p>Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<p>The DPD contains a series of policies (D 1 to 8) that address the infrastructure implications of development. These policies identify who is responsible for delivery and the timescales involved.</p>
<p>Is it clear who is intended to implement each part of the strategy/ development plan document?</p> <p>Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<p>The implementation of the DPD will be the responsibility of the Council through determination of planning applications and developers through implementation of those permissions. In both cases there is likely to be a need to work with other organisations to ensure timely determination and delivery.</p>

# Soundness Self Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Key Question	Evidence
<p>Does the development plan document reflect the concept of spatial planning?</p> <p>Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places and how they function?</p>	<p>The DPD has been drawn up to be in conformity with the Core Strategy and the Sustainable Community Strategy and so inherently reflects the concept of spatial planning. Its policies link with implementation of a number of other plans and programmes of the Council, its partners, the Local Strategic Partnership and the Local Area Agreement.</p> <p>Representations from EERA, GO-East, the Highways Agency and Cambridgeshire County Council who are responsible for other strategies affecting Huntingdonshire, have been supportive.</p>
<p>Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?</p>	<p>As the Development Management DPD seeks to guide the form of development but does not allocate sites will be determined as and when planning applications are submitted in response to the requirements and criteria of the policies.</p>
<p><b>Flexible</b></p>	
<p>Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<p>As the Development Management DPD seeks to guide the form of development but does not allocate sites the policies have been drawn up to be flexible and applicable to a wide range of planning applications.</p> <p>Several policy topics particularly with regard to Climate Change have seen are expected to continue to see changes in national policy and so have been drawn up with this in mind. The policies therefore are inherently flexible and can accommodate changes in national policy.</p> <p>Proposals for monitoring the effects of the DPD are contained in the Monitoring chapter of the proposed submission document. The Sustainability Appraisal sets out the proposals for monitoring and the monitoring framework:</p> <p>The effectiveness of policies is monitored annually through the Annual Monitoring Report (AMR). A number of data items are collected by Cambridgeshire County Council from various sources and supplied to Huntingdonshire District Council prior to inclusion in the AMR.</p> <p>This Statement of Consultation contains information on trends and baseline data on which the DPD is based.</p>
<p>Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?</p>	<p>Changes to the RSS such as revised housing figures would not affect the DPD as it does not allocate site to achieve such requirements.</p>

# Soundness Self Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Key Question	Evidence
Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?	The introductory part of the Monitoring section (11.1) indicates that if, as a result of monitoring, areas are identified where a policy is not working, or key policy targets are not being met, this may give rise to a review of the DPD. The Council has indicated that it will consider drawing up Supplementary Planning Documents (SPD) to provide additional guidance. SPD gives the opportunity to supplement policies which may address issues with poorly performing policies.
<b>Monitoring</b>	
Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?	The Monitoring section of the DPD sets out the indicators and targets.
Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?	The indicators are clear and replicate the existing format of the Annual Monitoring Report.
Are suitable targets and indicators present (by when, how and by whom)?	Many of the indicators are core indicators set by government. If these change over time the Annual Monitoring Report will refer to up to date indicators.

**Table 99 Soundness Testing - National Policy**

Key Question	Evidence
Does the development plan document contain any policies or proposals that are not consistent with national planning policy?  If yes, is there a local justification?	All policies are consistent with national planning policy.
Does the development plan document contain policies that do not add anything to existing national guidance?  If so, why have they been included?	Every effort has been made to avoid including policies which do not add anything to existing national guidance. All policies are considered to have a local justification.



## Legal Compliance Assessment

The PINS guide, Examining Development Plan Documents: Soundness Guidance, details the seven questions that the Inspector will use when considering whether the plan meets the legal requirements under Section 20(5) of the Act. This annex forms the legal compliance assessment using the legal compliance toolkit produced by the Planning Advisory Service.

The assessment contains 5 parts:

- Stage 1: Inception which covers the planning of the production of the DPD;
- Stage 2: Plan Preparation Frontloading which covers the requirements for frontloading the DPD (principally the Initial Issues and Options stage);
- Stage 3: Plan Preparation Formulation which covers the requirements for formulation of the contents of the DPD (principally the Preferred Approach stage);
- Stage 4: Publication which covers the requirements when publishing the DPD for the current Proposed Submission Stage; and
- Stage 5: Submission which covers the requirements when submitting the DPD. Stage 5 will be completed when the AAP is submitted to the Secretary of State for examination. The section for Stage 5 explains some of the process and tasks that will be undertaken and identifies some of the toolkit questions that correspond to questions the Inspector will use to help determine whether the plan is legally compliant.

### Stage 1: Inception

In terms of legal compliance, the main issues for the inception stage are in relation to:

- pre-planning for community engagement
- planning the sustainability appraisal (including consultation with the statutory environment consultation bodies)
- ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.

**Table 100 Stage 1: Inception**

Activity	Legal Requirement/ Guidance Reference	Evidence
Is the development plan document identified in the adopted local development scheme and have you recorded the timetable for its production?	The Act section 15(2); section 19(1) PPS12 paragraphs 4.50; 4.53-4.58 Milestones are set out in PPS12 (box after paragraph 4.55).	The Local Development Scheme 2010 (LDS 2010) produced in February 2010 identifies all the documents that are to be produced as part of the LDF including the Development Management DPD and an anticipated timetable for their production. The LDC 2010 updates the previous Local Development Scheme which detailed milestones for the Development Management DPD then known as the Development Control Policies DPD. The actual production timetable for the DPD is recorded in this Statement of Consultation. In summary it was: <ul style="list-style-type: none"> <li>• Issues and Options May 2007</li> </ul>

# Legal Compliance Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Activity	Legal Requirement/ Guidance Reference	Evidence
		<ul style="list-style-type: none"> <li>Development of Options January 2009</li> <li>Proposed Submission (anticipated March 2010)</li> </ul>
Have you considered how community engagement is programmed into the preparation of the development plan document?	The Act section19(3), Regulation 25 PPS12 paragraphs 4.19-4.29	The Statement of Community Involvement (SCI) 2006 sets out the principles of how people should be involved in the preparation of the LDF. This Statement of Consultation records who was involved at each stage of the process.
Have you considered the appropriate bodies you should consult?	Regulation 25 PPS12 paragraphs 4.25 -4.26 Plan Making Manual – Consultee list Regulation 2 defines the general and specific consultation bodies	Appendix 1 to the SCI sets out the list of consultees normally contacted in respect of the LDF. PPS12 was amended in 2008 but there was no fundamental change on this matter. This Statement of Consultation records who was involved at each stage of the process.
Is baseline information being collected and evidence being gathered to keep the matters which affect the development of the area under review?	The Act, section13 PPS12 paragraphs 4.36 – 4.47	Key sources were recorded within each chapter of the Development of Options. All relevant sources have been updated and recorded in this Statement of Consultation.
Is baseline information being collected and evidence being gathered to set the framework for the sustainability appraisal?	The Act section19(5) PPS12 paragraphs 4.50; 4.39-4.43 Strategic Environmental Assessment Guide, chapter five	Chapter 4 of SA Scoping Report (2007) sets out the baseline information which was used to produce the SA objectives. This information is summarised in table 3 of the Scoping Report.
Have you consulted the statutory environment consultation bodies for five weeks on the scope and level of detail of the environmental information to be included in the sustainability appraisal report?	Regulations 9 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633. PPS12 paragraph 4.40 SEA Guide Ch 3 The Strategic Environmental Assessment consultation bodies are also amongst the 'specific consultation bodies' which are defined in Regulation 2)	Correspondence, including a copy of the SA Scoping Report, was sent to the five statutory bodies on 21 September 2007.

## Stage 2: Plan Preparation Frontloading

The council is required to invite specific and general consultation bodies to make representations about the content of the development plan document. The New Regulation 25 section in the Plan Making Manual observes that the requirements of the regulations may be fulfilled by other activities of the council and its partners.

Information assembled during this phase contributes to:

# Legal Compliance Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

- showing that the procedures have been complied with
- developing alternatives and options and appraising them through sustainability appraisal and against evidence.

The council should record actions taken during this phase as they will be needed to show that the plan meets the legal requirements. They will also show that a realistic and reasonable approach has been taken to plan preparation.

You can refer to the following sections of the Plan Making Manual:

- Preparation of development plan documents
- Core strategy: managing its development
- Sustainability Appraisals: challenge questions
- Developing the evidence base

**Table 101 Stage 2: Plan Preparation - Frontloading (Issues and Options 2007)**

Activity	Legal Requirement/ Guidance Reference	Evidence
Have you notified the specific consultation bodies that have an interest in the subject of the development plan document and invited them to make representations about its contents?	Regulation 25(1) and (2)(a) PPS12 paragraphs 4.24 – 4.29  Specific consultation bodies are defined in Regulation 2	All specific consultation bodies were invited to make representations on the Issues and Options 2007. This stage is set out in 'Initial Issues and Options' in this Statement of Consultation. All specific consultees are registered on the Council's Limehouse Database and are notified of events. Representations from the specific consultation bodies are available, together with all other representations through the <a href="#">Consultation Portal</a> .
Have you notified the general consultation bodies that you consider have an interest in the subject of the development plan document and invited them to make representations about its contents?	Regulation 25(1) and (2)(b) PPS12 paragraphs 4.24 – 4.29  General consultation bodies are defined in Regulation 2.	General consultation bodies have been consulted in accordance with the approach set out in the SCI. The bodies consulted and events carried out as part of this process are set out in this Statement of Consultation. General consultees are registered on the Council's Limehouse Database and are notified of events.
Are you inviting representations from people resident or carrying out business in your area about the content of the development plan document?	Regulation 25(3) PPS12 paragraphs 4.24 – 4.29	Consultation events are publicised in a number of ways identified in this Statement of Consultation. General consultees are registered on the Council's Limehouse Database and are notified of events.
Are you engaging with stakeholders responsible for delivery of the strategy?	Regulation 25 PPS12 paragraphs 4.4; 4.27 – 4.29; 4.45 PPS12 paragraph 4.29 gives examples of relevant delivery agencies	Stakeholders are registered on the Council's Limehouse Database and are notified of events. Specific stakeholders have been engaged specifically to address particular issues as detailed in this Statement of Consultation.

# Legal Compliance Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Activity	Legal Requirement/ Guidance Reference	Evidence
Are you taking into account representations made?	Regulation 25(5) PPS12 paragraphs 4.19-4.29; 4.37	2 'Developing the DPD' of this Statement of Consultation details how the development of the DPD has responded to the representations made. Responses to the individual representations on the Development of Options are available <b>in Development of Options Responses of this Statement of Consultation and</b> online through the <a href="#">Consultation Portal</a> .
Does the consultation contribute to the development and sustainability appraisal of alternatives?	The Act section19(5), Regulations 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633.  PPS12 paragraphs 4.39-4.43. SEA Guide, chapter three	The responses from the Issues and Options 2007 contributed to the development of the Development of Options consultation, the responses from which in turn helped with preparation of the the proposed submission document. An Initial SA was prepared for the Issues and Options 2007. The Draft Final SA 2009 identifies how the earlier appraisals contributed to changes in the approach.
Is the participation: <ul style="list-style-type: none"> <li>• following the principles set out in your statement of community involvement</li> <li>• integrating involvement with the sustainable community strategy</li> <li>• proportionate to the scale of issues involved in the development plan document?</li> </ul>	The Act s.19(3), Regulation 25  PPS12 paragraphs 4.19 – 4.26; 4.42	The participation has followed the principles set out in the Statement of Community Involvement 2006. The Sustainable Community Strategy - Growing our Communities sets the overall priorities for the District. The participation has focused on key stakeholders proportionate to the scale of issues involved.
Are you keeping a record of: <ul style="list-style-type: none"> <li>• the individuals or bodies invited to make representations</li> <li>• How this was done</li> <li>• The main issues raised?</li> </ul>	Regulation 24 PPS12 paragraphs 4.24 – 4.29 A separate statement of representations under Regulation 30(1)(d) is required: see Submission stage below.	Representations have all been recorded electronically and are publicly viewable on the <a href="#">Consultation Portal</a> . The individuals or bodies invited to make representations, lists of those who made representations and the main issues raised are recorded in this Statement of Consultation.
Are you developing a framework for monitoring the effects of the development plan document?	The Act section 35, Regulation 48, Reg 17 of The Environmental Assessment of Plans and Programmes Regulations 2004 No1363  PPS12 paragraphs 4.39 – 4.43 and 4.47 SEA Guide, Chapter five	A monitoring framework is set out within the DPD using indicators in the Annual Monitoring Report.

# Legal Compliance Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Activity	Legal Requirement/ Guidance Reference	Evidence
	Office of the Deputy Prime Minister monitoring guide	
Have you arranged to send copies of documents used in consultation to the Government Office and Planning Inspectorate?	Not statutory, but will assist in identifying issues leading towards a sound development plan document Plan Making Manual - New Regulation 25	Copies of documents will be sent to the Government Office and Planning Inspectorate as required.

## Stage 3: Plan Preparation Formulation

This stage has many legal matters, for process and content, to address. Paragraphs 4.26 and 4.38 of PPS12 make it clear that explicit consideration of alternatives is a key part of the plan making process.

Reasonable alternatives identified in Stage 2: Plan Preparation Frontloading are assessed against the:

- completed body of information from evidence gathering;
- results of sustainability appraisal; and
- findings from community participation.

The results of participation on the preferred approach and an accompanying sustainability report will enable the council to gauge the community's response and receive additional evidence about the options. The council can then decide whether, and how, the preferred strategy and policies should be changed for publishing the finished development plan document.

Alternatives developed from the evidence and engagement during the frontloading stage need to be appraised to decide on the preferred strategy. Participation will also need to be carried out on it.

**Table 102 Stage 3: Plan Preparation - Formulation**

Activity	Legal Requirement/ Guidance Reference	Evidence
Are you preparing reasonable alternatives for evaluation during the preparation of the development plan document?	Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633 PPS12 paragraph 4.38, SEA Guide, Chapter five	The Issues and Options 2007 and the Development of Options 2009 identified alternatives for evaluation. This Statement of Consultation includes details of what alternatives were considered
Have you assessed alternatives against: <ul style="list-style-type: none"> <li>• consistency with national policy</li> <li>• general conformity with the regional spatial strategy?</li> </ul>	The Act section 19(2), section 24 PPS12 4.30 – 33	Consistency with all relevant national and regional policies is identified in the Soundness Self Assessment. GO-East and EERA have been included in consultation on the development of the DPD and so had the opportunity to identify potential problems with consistency and conformity. No such problems have been identified.

# Legal Compliance Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Activity	Legal Requirement/ Guidance Reference	Evidence
Are you having regard to: <ul style="list-style-type: none"> <li>• adjoining regional spatial strategies</li> </ul>	The Act section 19(2), Regulation 15(1)(g)	The RSS for the East Midlands has been considered but no cross boundary issues were identified. The East Midlands Regional Assembly were included in consultation on the development of the DPD and so had the opportunity to identify potential problems. No such problems have been identified.
Are you having regard to: <ul style="list-style-type: none"> <li>• the sustainable community strategy of the authority or other authorities whose area comprises part of the area of the council</li> <li>• any other local development documents adopted by the council?</li> </ul>	The Act section 19(2) PPS12 paragraphs 1.6; 4.22 - 4.23; 4.34 - 4.35	Consistency with the Sustainable Community Strategy and the Core Strategy is identified in the Development of Options 2009 and within this Statement of Consultation in respect of each policy.
Do you have regard to other matters and strategies relating to: <ul style="list-style-type: none"> <li>• resources</li> <li>• the regional development agencies' regional economic strategy</li> <li>• the local transport plan and transport facilities and services</li> <li>• waste strategies</li> <li>• hazardous substances and accidents?</li> </ul>	The Act section 19(2), Regulation 15	Relevant plans and strategies were identified and included in the production of the Sustainability Appraisal Scoping Report. Relevant plans and programmes were identified and considered in drawing up draft policies for the Development of Options consultation. Relevant plans and programmes have been identified in Appendix 2 'Evidence Base and Supporting Documents'
Are you having regard to the need to include policies on mitigating and adapting to climate change?	Annex to PPS1 on climate change	A specific chapter and policies have been included to address mitigation and adaptation to climate change. This matter is covered in the Core Strategy at a strategic level, with policies in the DPD supporting delivery of Core Strategy Objectives.

# Legal Compliance Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Activity	Legal Requirement/ Guidance Reference	Evidence
<p>Have you undertaken the necessary sustainability appraisal of alternatives, including consultation on the sustainability appraisal report?</p>	<p>The Act section 19(5), Regulation 12 and 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p> <p>PPS12 paragraphs 4.38 – 4.43, SEA Guide, Chapter five</p> <p>Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633 sets out the consultation procedures</p>	<p>There has been an Initial SA 2007, Draft Final SA 2009 and the Proposed Submission document is accompanied by a Final SA. A Habitats Regulations Assessment also accompanies the Proposed Submission document.</p>
<p>Are you setting out clear reasons for any preferences between alternatives?</p>	<p>Regulation 13(1) PPS12 paragraphs 4.36 – 4.38</p>	<p>The development of draft policies in the Development of Options and the reasons for preferences are set out in the Development of Options document and are summarised in this Statement of Consultation.</p>
<p>Have you taken into account any representations made on the content of the development plan document and the sustainability appraisal?</p> <p>Are you keeping a record?</p>	<p>Regulations 24, 25(5) and 30(1)(d)(iv), Regulation 13(4) of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633</p> <p>PPS12 paragraphs 4.19 – 4.29</p> <p>Records on the sustainability appraisal should also include recording any assessment made under the Habitats Directive</p>	<p>The development of draft policies in the Development of Options including comment on particular representations and the themes of representations are set out in the Development.</p> <p>There have been very few comments on the sustainability appraisal. However the Final SA includes consideration of comments received at early SA stages.</p> <p>All comments are recorded and available through the Council's <a href="#">Consultation Portal</a>.</p>
<p>Where sites are to be identified or areas for the application of policy in the development plan document, are you preparing sufficient illustrative material to:</p> <ul style="list-style-type: none"> <li>• enable you to amend the currently adopted proposals map</li> <li>• inform the community about the location of proposals?</li> </ul>	<p>Regulations 9 and 14 PPS12 paragraphs 4.6 - 4.7; 8.1-8.3</p> <p>A map showing changes to the adopted proposals map is part of the proposed submission documents defined in Regulation 24.</p>	<p>The Development of Options consultation included a series of maps identifying proposals for designations and where existing designations such as Conservation Areas had changed since the Proposals Map was produced.</p> <p>Plans accompany the Proposed Submission document, based on those drafted at the Preferred Approach, amended as appropriate reflecting changes from the draft policies.</p>

# Legal Compliance Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Activity	Legal Requirement/ Guidance Reference	Evidence
Are the participation arrangements compliant with the statement of community involvement?	The Act, section 19(3), Regulation 25  PPS12 paragraphs 4.19-4.29	The participation has followed the arrangements set out in the SCI
Have you remained in close contact with the Government Office and discussed any emerging issues that might affect the soundness of the development plan document?	Plan Making Manual - New Regulation 25	The Government Office has been consulted at each stage of consultation on the DPD. The representation received from GO-East at the Development of Options stage indicated that there was no need for further discussion.

## Stage 4: Publication

The 2008 Local Development Framework Regulations change the procedure for submission of development plan documents. They bring the period for formal representations forward, which now takes place before the development plan document is submitted for examination.

When moving towards publication stage, the council should consider the results of participation on the preferred strategy and sustainability appraisal report and decide whether to make any changes. In the event that changes are required, the council will need to choose either to:

- do so and progress directly to publication

OR

- produce and consult on a revised plan.

The latter may be appropriate where the changes to the development plan document bring in changed policy or proposals not previously covered in community participation and the sustainability appraisal. It avoids having to treat publication as if it were a consultation, which it is not. It also provides insurance in relation to compliance with the Strategic Environmental Assessment Regulations. Legally, during any participation on a revised plan, councils should:

- comply with the requirements of their statement of community involvement
- update the sustainability appraisal report.

The council should then produce the development plan document in the form in which it will be published. This includes removing material dealing with the evaluation of alternatives and the finalisation of the text. The council should be fully happy that it wishes to adopt the development plan document in this form, and that it considers it to be sound and fit for examination.

Councils should make it clear that publication of a development plan document is not public participation, nor a consultation. The six weeks publication period is the opportunity for those dissatisfied (or satisfied) with the development plan document to make formal representations to the inspector about its soundness and legal compliance.

The possibility of change under certain circumstances is allowed for in the new procedures, and is described in 'stage five: Submission'.



# Legal Compliance Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

**Table 103 Stage 4: Publication**

Activity	Legal Requirement/ Guidance Reference	Evidence
Have you prepared the sustainability appraisal report?	The Act section19(5), Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 No 1633  PPS12 paragraphs 4.38 – 4.43, SEA Guide Chapter five	The Final Sustainability Appraisal is published alongside the Proposed Submission document.
Have you made clear where and within what period representations must be made?	Regulation 28(2) and (3) The period must be at not less than 6 weeks from when you give notice under Regulation 27(e) (see below)	A period of 6 weeks, is allowed for representations. Details are set out in the Statement of Representations Procedure.
Have you made copies of the following available for inspection: <ul style="list-style-type: none"> <li>• the proposed submission documents?</li> <li>• the statement of the representations procedure?</li> </ul>	Regulation 27(a) Regulation 24 gives definitions	The Proposed Submission documents and Statement of Representations Procedure is available for inspection at the Council's Customer Services Centre and libraries in the same way as for consultation stages.
Have you published on your website the following: <ul style="list-style-type: none"> <li>• the proposed submission documents?</li> <li>• the statement of the representations procedure?</li> <li>• statement and details of where and when documents can be inspected?</li> </ul>	Regulation 27(b) Regulations 2 and 24 give definitions	All required information is available on the Council's website.
Have you sent to each of the specific consultation bodies invited to make representations under Regulation 25(1): <ul style="list-style-type: none"> <li>• A copy of each of the proposed submission documents</li> <li>• The statement of the representations procedure?</li> </ul>	Regulation 27(c) Regulations 2 and 24 give definitions	All required information has been sent to each of the specific consultation bodies.
Have you sent to each of the general consultation bodies invited to make representations under Regulation 25(1): <ul style="list-style-type: none"> <li>• the statement of the representations procedure?</li> <li>• where and when the documents can be inspected?</li> </ul>	Regulation 27(d) Regulations 2 and 24 give definitions	All required information has been sent to each of the general consultation bodies.

# Legal Compliance Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

Activity	Legal Requirement/ Guidance Reference	Evidence
Have you given notice by local advertisement setting out: <ul style="list-style-type: none"> <li>the statement of the representations procedure</li> <li>where and when the documents can be inspected?</li> </ul>	Regulation 27(e) Regulation 24 gives definitions	An advertisement has been prepared for the Hunts Post and the Peterborough Evening Telegraph advising publication of the Proposed Submission, including information on where and when documents can be inspected and the procedure for making comments.
Have you requested the opinion of the regional planning body on the general conformity of the development plan document with the regional spatial strategy?	The Act section 24, Regulation 29  PPS12 paragraph 4.21 The period is six weeks from when you make copies available for inspection under Regulation 27(a)	The opinion of the regional planning body on the general conformity of the development plan document has been sought.

## Stage 5: Submission

Stage 5 of the Legal Compliance Tool will be completed for submission of the DPD.

Stage 5 of the legal compliance tool seeks to establish whether the plan is in compliance with the statement of community involvement, the Habitats Directive and the Strategic Environmental Assessment Directive. It also seeks to ensure that the Council remains fully compliant in the approach it takes to changes.

The guidance in the PAS Plan Making Manual will be used to consider whether the plan is ready to be submitted and whether it is appropriate to make changes to the plan prior to Submission. The Plan Making Manual distinguishes between 'focused changes', 'extensive changes' and 'minor changes' and the course of action appropriate if these changes are considered necessary.

The PINS guide identifies a series of key questions that inspectors will use in relation to legal compliance. These are incorporated into questions in the Legal Compliance Tool for Stage 5 as follows:

- Has the development plan document been prepared in accordance with the local development scheme?
- Does the development plan document's listing and description in the local development scheme match the document?
- Have the timescales set out in the local development scheme been met?
- Has the development plan document had regard to any sustainable community strategy for its area (county or district)?
- Is the development plan document in compliance with the statement of community involvement?
- Has the council carried out consultation as described in the statement of community involvement?
- Has the development plan document been subject to sustainability appraisal?
- Has the council provided a final report of the findings of the appraisal?
- Does the development plan document contain any policies or proposals that are not in general conformity with the regional spatial strategy? If yes, is there local justification?
- Has the council got confirmation from the regional planning body about the general conformity of the plan with the regional spatial strategy?
- Does the development plan document comply with the 2004 regulations (as amended)?

# Legal Compliance Assessment

Huntingdonshire LDF | Development Management DPD: Statement of Consultation

- Specifically, has the council published the prescribed documents, and made them available at their principal offices and their website?
- Has the council placed local advertisements?
- Has the council notified the development plan document bodies?
- Does the development plan document contain a list of superseded saved policies?
- If the development plan document is not a core strategy, is it in conformity with the core strategy?

There are legal requirements that need to be followed after submission, other than the notification of the examination, which the Legal Compliance tool does not deal with. Reference should be made to the PINS guidance for further advice.