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Report on Godmanchester Neighbourhood Plan 2017-2036

An Examination undertaken for Huntingdonshire District Council with the support of the Godmanchester Town Council on the May 2017 submission version of the Plan.

Independent Examiner: Jill Kingaby BSc(Econ), MSc, MRTPI

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Intelligent Plans and Examinations (IPE) Ltd, Regency Offices, 37 Gay Street, Bath BA1 2NT

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Contents

	Page
Main Findings - Executive Summary	3
1. Introduction and Background	3
• Godmanchester Neighbourhood Plan 2017 – 2036	3
• The Independent Examiner	4
• The Scope of the Examination	4
• The Basic Conditions	5
2. Approach to the Examination	6
• Planning Policy Context	6
• Submitted Documents	6
• Site Visit	7
• Written Representations or Public Hearing	7
• Modifications	7
3. Procedural Compliance and Human Rights	7
• Qualifying Body and Neighbourhood Plan Area	7
• Plan Period	8
• Neighbourhood Plan Preparation and Consultation	8
• Development and Use of Land	8
• Excluded Development	9
• Human Rights	9
4. Compliance with the Basic Conditions	9
• EU Obligations	9
• Main Issues	9
• Issue 1: Housing and Economic Development	10
• Issue 2: Protecting the Semi-Rural Character of the Town and the Surrounding Countryside	13
• Issue 3: Transport	17
• Other Matters	20
5. Conclusions	20
• Summary	20
• The Referendum and its Area	20
Appendix: Modifications	22

Main Findings - Executive Summary

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

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – [the Godmanchester Town Council];
- The Plan has been prepared for an area properly designated – the Neighbourhood Plan area which is the same as Godmanchester Parish as shown on Figure 1, Page 7 of the Neighbourhood Plan;
- The Plan specifies the period to which it is to take effect – [2017-2036]; and
- The policies relate to the development and use of land for a designated neighbourhood area.

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

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

1. Introduction and Background

Godmanchester Neighbourhood Plan 2017- 2036

- 1.1 Godmanchester is a small town, with some 6,800 residents in 2016, located south of Huntingdon and separated from it by the valley of the River Great Ouse. The town has a long history having been a Roman settlement, and a Borough Town chartered by King John in the thirteenth century. Godmanchester, containing more than 100 listed buildings and two conservation areas and with a waterside location, has an elegant and distinctive character. Its development over the centuries has been closely tied to its strategic position on the old Roman road from London to York. In the Middle Ages, it developed as an inland port and prosperous market town. With the East Coast main rail line and A1 road to the west and M11/A14 to the east, Godmanchester remains a highly accessible settlement. The town is fairly intensively developed and compact, but is surrounded by open countryside of high value for its biodiversity, agricultural land value, scenic beauty and landscape quality.

- 1.2 The Town Council started the neighbourhood plan process in January 2015 and the area was designated in March 2015. The Basic Conditions Statement, which includes the Consultation Statement, records a range of measures used to inform and involve the local community and stakeholders in plan-making. Regulation 16 consultation on the submission Neighbourhood Plan was carried out in May and June 2017 and the Godmanchester Neighbourhood Plan (GNP) was submitted for examination in July 2017.

The Independent Examiner

- 1.3 As the Plan has now reached the examination stage, I have been appointed as the examiner of the GNP by Huntingdonshire District Council, with the agreement of Godmanchester Town Council.
- 1.4 I am a chartered town planner and former government Planning Inspector, with experience of examining other neighbourhood plans. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft plan.

The Scope of the Examination

- 1.5 As the independent examiner I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.6 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:
- Whether the Plan meets the Basic Conditions;
 - Whether the Plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the Local Planning Authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;

- it does not include provisions and policies for 'excluded development';
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;
 - whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum; and
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').

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

The Basic Conditions

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

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

1.9 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the neighbourhood plan should not be likely to have a significant effect on a European Site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European Offshore Marine Site (as defined in the Offshore Marine Conservation (Natural Habitats etc.) Regulations 2007), either alone or in combination with other plans or projects.

2.0 Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for this part of Huntingdonshire, not including documents relating to excluded minerals and waste development, is the Huntingdonshire Core Strategy adopted in September 2009; and saved policies from the Local Plan 1995 and Local Plan Alteration 2002. The Core Strategy sets out the spatial framework for Huntingdonshire's future to 2026. It is a legal requirement that the GNP must be in general conformity with the strategic policies in the development plan and this is reflected in national policy in the National Planning Policy Framework (NPPF) paragraph 184.
- 2.2 Consultation is underway (July and August 2017) for Huntingdonshire's Local Plan to 2036: Consultation Draft 2017. This emerging plan for the area is expected to be submitted to the Secretary of State for examination in March 2018. Although it does not as yet constitute part of the statutory development plan for the area, there are similarities with the GNP in respect of evidence bases and timescales. If an emerging Local Plan is in conflict with a neighbourhood plan, there is a risk that, when the Local Plan is adopted, it will undermine the effectiveness of that neighbourhood plan. Having regard for these factors and the advice in the Planning Practice Guidance (PPG)¹, I shall take the emerging Local Plan into consideration in this examination.
- 2.3 The planning policy for England is set out principally in the NPPF and the PPG offers guidance on how this policy should be implemented.

Submitted Documents

- 2.4 I have considered all policy, guidance and other reference documents that I consider relevant to the examination, including those submitted, which comprise:
- the GNP 2017-2036, Submission Version 2017;
 - Figure 1 of the Plan which identifies the area to which the proposed neighbourhood development plan relates;
 - the Basic Conditions Statement which includes the Consultation Statement, April 2017;
 - all the representations that have been made in accordance with the Regulation 16 consultation;

¹ PPG Reference ID 41-009-20160211.

- the Strategic Environmental Assessment and Habitat Regulations Assessment Screening Report prepared by Huntingdonshire District Council, April 2017; and
- The requests for additional clarification sought in my letters of 24 July 2017 and 26 July 2017 and the responses annotated on those letters by the Town Council².

Site Visit

- 2.5 I made an unaccompanied site visit to the Neighbourhood Plan Area on 20th July 2017 to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations or Public Hearing

- 2.6 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum. Godmanchester Town Council helpfully answered in writing the questions which I put to them in letters of 24 July 2017 and 26 July 2017.

Modifications

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

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The GNP has been prepared and submitted for examination by Godmanchester Town Council which is a qualifying body, for the parish of Godmanchester, an area that was designated by Huntingdonshire District Council on 11 March 2015.
- 3.2 It is the only neighbourhood plan for Godmanchester, and does not relate to land outside the designated neighbourhood area.

²View at: <http://gmccouncil.com/wp-content/uploads/2017/07/Examiner-Request-for-information-Godmanchester-002.pdf> and <http://gmccouncil.com/neighbourhood-plan-examiners-request-of-information-response/>

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Plan Period

- 3.3 The cover of the Plan specifies clearly the period to which it is to take effect, which is from 2017 to 2036. However, paragraph 1.1 refers to a plan period 2016-36, and should be modified to read "2017-36" to avoid discrepancy with the front cover. The Town Council informed me (in its response to my letter of 24th July 2017) that the Submission Version of the GNP was finalised in May 2017. **PM1** should be made to correct³ these key dates for the benefit of users and readers of the Plan.

Neighbourhood Plan Preparation and Consultation

- 3.4 The Town Council began preparing a neighbourhood plan in 2014/ 2015 following information in the Winter Newsletter delivered to all households and available on the Town Council's website in late 2014. The neighbourhood plan area was designated in March 2015, and reports on progress with planning were provided at the annual Council meeting in May 2015, and monthly thereafter. Appendix 2a of the Basic Conditions Statement accompanying the submitted Neighbourhood Plan lists the engagement activities undertaken to inform and involve local people in plan-making thereafter. These included face-to-face meetings and workshops with stakeholder groups, approaches to landowners and their agents, social media activities, events in Godmanchester such as Gala Day and Christmas Lights events, and contact with Schools and the Youth Club.
- 3.5 Pre-submission Regulation 14 consultation took place between November 2016 and January 2017, and 33 responses were received. Regulation 16 consultation on the submission Neighbourhood Plan was carried out between 8 May and 19 June 2017, and responses were received from seven parties including the late representation from Cambridgeshire County Council Transport Assessment Team. I accept that the Town Council has undertaken an extensive and prolonged period of engagement with the local community and stakeholders, as described in the Consultation Statement. I am satisfied that the consultation process has both met the legal requirements and had regard to the advice in the PPG on plan preparation, and is therefore procedurally compliant.

Development and Use of Land

- 3.6 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act. However, Policy GMC7 does not relate wholly to the development or use of land and I have recommended modifications in paragraph 4.24 to make it legally compliant.

³ Paragraph 10(3)(e) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) provides for the recommending of modifications for the purpose of correcting errors.

Excluded Development

- 3.7 The Plan does not include provisions and policies for 'excluded development'.

Human Rights

- 3.8 Huntingdonshire District Council has not stated that the Plan would breach Human Rights (within the meaning of the Human Rights Act 1998), and from my independent assessment I see no reason to disagree.

4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The neighbourhood plan was screened for Strategic Environmental Assessment (SEA) by Huntingdonshire District Council, which found that it was unnecessary to undertake SEA. Having read the Strategic Environmental Assessment and Habitat Regulations Assessment Screening Report April 2017, I am satisfied from my own consideration of this matter that this conclusion is correct.
- 4.2 The report also concluded that the GNP would not have an adverse effect on the integrity of any internationally designated sites either alone or in combination with any other plans. Therefore, Habitats Regulations Assessment (HRA) would not be triggered. Natural England wrote in support of this conclusion, and as a result of my independent assessment I endorse this view.

Main Issues

- 4.3 Having regard for the GNP, the consultation responses and other evidence, as well as my site visit, I consider that there are three main issues relating to the Basic Conditions for this examination. These are:
- Whether the GNP, in particular its Vision and Policies GMC1 and GMC2, and its subsequent policies regarding housing and economic development, is sufficiently positive to contribute to the achievement of sustainable development and meets all the Basic Conditions for neighbourhood planning;
 - Whether policies to protect the semi-rural character of the Town and the surrounding countryside are proportionate, taking account of the Town's history and heritage, and satisfy the Basic Conditions for neighbourhood planning; and
 - Whether policies for transport meet the Basic Conditions for neighbourhood planning, in particular for sustainable transport planning.

Issue 1: Housing and Economic Development

- 4.4 The NPPF's section 6, paragraphs 47 to 55, refers to delivering a wide choice of high quality homes and boosting significantly the supply of housing. The Spatial Vision for Huntingdonshire in the Core Strategy addresses Sustainable Patterns of Growth and Sufficient Housing to Meet Needs. It commits to playing "a proactive role in accommodating housing growth... required as part of the London-Stansted-Cambridge-Peterborough growth corridor ..". Policy CS2 identifies the Huntingdon Spatial Planning Area, which includes Godmanchester, where 1,800 new homes will be provided between 2009 and 2026, including significant mixed use development on greenfield land adjoining Godmanchester.
- 4.5 Policy CS3 of the Core Strategy provides a settlement hierarchy "to manage the scale of housing development appropriate on unallocated sites". Godmanchester is categorised as a key service centre where development schemes of moderate and minor scale and infilling may be appropriate within the built-up area. Moderate scale development is defined as 10-59 dwellings, minor scale is up to 9 dwellings and infilling up to 3 dwellings.
- 4.6 Chapter 2 of the GNP advises that Huntingdonshire is one of the fastest growing parts of Cambridgeshire and the United Kingdom. With approximately 6,800 residents in 2016, Godmanchester is expected to accommodate around 8,600 by 2040, implying a growth rate of about 26%. Chapter 3 sets out the Challenges for Godmanchester which includes the theme that additional housing growth may create problems, such as the risk of Godmanchester becoming a dormitory town for Cambridge and other nearby towns. Other issues identified include Godmanchester losing its independence from Huntingdon and its separation from surrounding settlements, the exacerbation of traffic congestion and parking problems and adverse effects on the character of the Town's "historic core".
- 4.7 The GNP Vision begins by stating that, by 2036, the town's historic core, rich architecture and beautiful open spaces will have been protected for the enjoyment of residents and visitors. New residents in new developments will be welcomed, but any further development will be within the town's existing built boundary. The Neighbourhood Plan objectives arguably could be characterised as conservative, with the first two aiming to protect and enhance the countryside and open spaces, and the historic heritage. Any new housing development should meet the needs of local people and benefit the Town. Policy GMC1: The importance of the countryside setting states that development shall be focused within the settlement boundary, which is shown on Map 6 in Chapter 10 of the GNP.
- 4.8 Chapter 10 helpfully sets out the methodology for defining the settlement boundary. Importantly, in my opinion, the boundary includes sites for new development that have been allocated in the Core Strategy 2009, and

have been put forward in the emerging Local Plan for 2036. The emerging Local Plan Policies HU16 to HU19 envisage new mixed use development at Tyrell's Marina (with approximately 15 homes), mixed use development at RGE Engineering site (approximately 70 homes), residential development at Wigmore Farm Buildings (approximately 13 homes) and a mix of new uses at Bearscroft Farm, also known as Romans' Edge (approximately 750 homes). I accept that the additional 848 new homes planned for these sites by 2036 will be a discernible change for the Town and its residents, but they should contribute to a major uplift in the local housing supply.

- 4.9 Consultation responses on the submitted GNP indicated some criticism of the settlement boundary and its implications for new housing development. Savills, on behalf of the Church Commissioners, put forward a possible new housing site off Corpus Christi Lane, which would be just outside the proposed settlement boundary. An amendment to the settlement boundary was proposed to include the site, with changed wording to refer to "accommodating future housing development in and around Godmanchester...". Fairfield Partnership with an interest in the Bearscroft Farm site questioned whether the GNP would make a sufficient contribution to Huntingdonshire's housing requirement to 2036. It considers that land east of Romans' Edge would be suitable for future development and could help deliver the aims and aspirations of the GNP. Gladman Developments Ltd also saw the settlement boundary as "unnecessarily restrictive", and recommended that a criteria-based approach for determining where development should be permitted should be used, so as to "resolve problems with delineated boundaries" in the earlier Local Plan.
- 4.10 I shall not comment on the desirability or otherwise of permitting housing development on the Corpus Christi Lane site, or east of Romans' Edge, or other potential housing sites in the Parish of Godmanchester. Huntingdonshire District Council will determine any relevant planning applications on their particular merits. However, the town of Godmanchester is quite intensively developed already so that limiting new development to "within the settlement boundary" could prevent new housing development, even of a moderate or minor scale. Although 848 new homes are planned on the sites named in the emerging Local Plan, there is no certainty that all the sites will deliver these numbers in full; in my experience, implementation can be delayed, sites abandoned and plans changed over time. Assessments of housing need may also change over time. The GNP is looking 19 years ahead, which is a relatively long time period, some 10 years beyond the Core Strategy. I consider it essential that the Plan should provide appropriately for new housing in this area of high demand (see paragraph 2.5 of the GNP), and allow for some flexibility over future housing sites and numbers.
- 4.11 Policy CS1 of the Core Strategy seeks to secure sustainable development, reflecting environmental, social and economic issues. Policies GMC1 and GMC2 of the GNP are focused on the importance of Godmanchester's

countryside setting and preserving the semi-rural feel within the Town. I appreciate that new housing development should not be so great in future that Godmanchester becomes "a large sprawling Town" instead of a "historic village". Providing new homes within walking distance of the Town's historic core should reduce the need to use the car for some trips and bring important social and environmental benefits. I am also aware that the countryside around the Town is precious for its agricultural land value, wildlife habitats, and high quality landscape alongside the River Great Ouse.

- 4.12 Nevertheless, in my opinion, Policy GMC1 should be modified to state that "Developmentshall be focused within or adjoining the settlement boundary as identified in the plan." It should be made clear that any new development should be either infill or of a minor or moderate scale, so that the local distinctiveness of the settlement is not compromised. **PM2** should be made to achieve this flexibility and ensure that regard is had to the NPPF and the promotion of sustainable development. PM2 is also needed to ensure that the GNP will be in general conformity with the aims for new housing development in the Core Strategy and align with similar aims in the emerging Local Plan.
- 4.13 Chapter 6 of the GNP entitled 'Housing' is very brief, and includes no figures for the scale of new housing development expected over the plan period. Appendix 2 of the GNP lists policies in the development plan and emerging Local Plan for Huntingdonshire which relate to the character and type of permissible housing. Whilst Policy GMC13 of the GNP provides useful design principles for residential infill and back land development, there is currently no reference to minor or moderate scale development. Paragraph 184 of the NPPF is clear that neighbourhood plans should not promote less development than set out in the Local Plan or undermine its strategic policies. I consider that Policy GMC13 should be modified to accord with this aim of the NPPF, to secure general conformity with the Core Strategy and alignment to the emerging Local Plan, and to make allowance for new housing proposals other than infilling and back land development. **PM5** should be made to achieve this, and to clarify that any new development should be designed to respect the character of the neighbouring streetscene and historic core. PM5 should also be made to secure support for new housing development within reasonable walking distance of the town's historic core.
- 4.14 On Pages 11-15 of the GNP, it is reported that Godmanchester has a high proportion of residents aged 25-60 years, and high levels of economic activity with many people in full-time employment. Overall, residents have a high level of qualifications. The sixth objective of the GNP on Page 19 is to "Help local businesses thrive". Policy GMC21 addresses "Growing new capacity for small scale businesses in the Town". The supporting text refers to paragraph 28 of the NPPF on supporting a prosperous rural economy. The GNP describes the comparatively high numbers of self-employed businesses in the Town, and the expectation that some 5 hectares (ha) of new B-class employment land will be delivered at the

Romans' Edge site. This is in general conformity with Policy CS7 of the Core Strategy relating to new employment land. In order to align better with the modified Policy GMC1, and in the interests of sustainable development, I propose that Policy GMC21 should also refer to the provision of new or converted buildings within "or adjoining" the settlement boundary of the Town. Providing that **PMS** is made, Policy GMC21 will satisfy the Basic Conditions.

- 4.15 Policy GMC2, appropriately in my opinion, supports development proposals that would enhance the tourist and visitor attractions in the area. It aligns with the emerging Local Plan Policy LP22 relating to tourism and recreation in the countryside. Supporting text for GMC2 refers to a proposed Neolithic Country Park on reclaimed land in the countryside east of the town. Policy GMC5 supports proposals that will make the most of waterside assets for quiet and low impact leisure, with low risk to wildlife. I consider that both policies have had regard for paragraph 28 of the NPPF, and should contribute to the achievement of sustainable development in accordance with the Basic Conditions.
- 4.16 Page 12 of the Core Strategy states that the majority of housing growth will take place in the most sustainable locations, but more limited housing development in larger villages will help sustain their existing facilities and amenities without damaging their character. This principle applies in Godmanchester, where there is concern that the settlement could become a dormitory town serving Cambridge (paragraph 3.1 of the GNP). Chapter 7 sets out an ambition for the town's future self-sufficiency protecting existing community infrastructure and providing more facilities. It wishes to ensure that the Town has sufficient good schools, health services, a range of local shops and post office/banking services. I am satisfied that Policies GMC17-20 of the GNP seek to broadly align with Policies LP5 and LP21 of the emerging Local Plan regarding the location of proposed town centre and other uses. In addition, I consider that my proposed modification to Policy GMC1, enabling some minor or moderate scale development in the future, should ensure that there is a growing population which will support a good range of local services and prevent some potential losses.
- 4.17 Providing the above modifications are made to the GNP, I conclude that its Vision and policies for housing and economic development including for visitor and tourist facilities and for community infrastructure and business, should be sufficiently positive to contribute to the achievement of sustainable development, and meet all the Basic Conditions for neighbourhood planning.

Issue 2: Protecting the Semi-Rural Character of the Town and the Surrounding Countryside

- 4.18 Policy GMC3 of the GNP designates 18 areas as Local Green Spaces (LGSs) (Nos 4-21 in Appendix 1). The NPPF advises that LGS designation will not be appropriate for most green areas or open spaces, and this

leads me to question whether as many as 18 sites in this Parish, with a single small Town, is excessive. Whilst the Town Council and local community wish to preserve the "semi-rural village feel" of Godmanchester, it also wishes to prevent the development of a sprawling Town, to maintain independence from Huntingdon and surrounding villages and hamlets, and to ensure that all homes are within walking distance of the historic core. If the Town includes a large number of LGSs, with protection equivalent to the Green Belt, it seems unlikely to me that sites for minor scale or infill housing development or for employment use will be available in suitable, accessible and urban locations. Too many LGSs could increase the risk of a sprawling town with developments on the edge far from the Town's core.

- 4.19 I note that several of the proposed LGS sites are not located within the settlement boundary for Godmanchester Town. Sites 6 and 7, the Recreation Ground leading to the lock and Queen's Walk, are undoubtedly special to the local community for a number of reasons as summarised in Appendix 1 of the GNP. However, both sites are located in the Post Street Conservation Area where their character and appearance will be preserved or enhanced in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990. The PPG advises that if land is already designated as a conservation area, then consideration should be given as to whether any additional local benefit would be gained from LGS status⁴. Sites 6 and 7 are also adjacent to Portholme Meadow Special Area of Conservation and Site of Special Scientific Interest (SSSI), designated as sites of international importance for wildlife and, in this protected environment, I consider that it is unnecessary to define the Recreation Ground and Queen's Walk as LGSs.
- 4.20 Sites 4, 5 and 19, the Nature Reserve at Cow Lane, Cow Lane gravel pits and the proposed Neolithic Country Park, are located east of the Town and outside the settlement boundary. The NPPF expects local green space to be in reasonably close proximity to the community it serves. Whilst some local residents will take walks regularly (eg. to exercise their dogs) and future residents are likely to support the proposed Country Park, these spaces are not immediately accessible like, for example, Buttermel. In addition, these sites are individually and collectively large, estimated as 61 acres (24.7 ha), 64 acres (25.9 ha) and 48 acres (19.4 ha) respectively. Gladman Developments Limited drew my attention to other NP Examiner's reports where conclusions had been reached that much smaller sites amounted to overly extensive tracts of land. In my view, examiners' judgments on proposed LGSs elsewhere, as to what constitutes an overly extensive tract of land, should not be treated as definitive. I have not adopted a solely quantitative approach in assessing the proposed LGSs, but have taken account of the specific context in which each site is located and each site's individual characteristics. A degree of judgment has necessarily been applied⁵. In the context of

⁴ PPG Reference ID:37-011-20140306.

⁵ PPG Reference ID: 37-015-20140306.

Godmanchester, I consider that sites 4, 5 and 19 are extensive tracts of land and therefore do not satisfy the criteria for LGS designation. It is also noteworthy that their countryside location and proximity to protected areas of Eastside Common SSSI and Westside Common, and inclusion in the Great Ouse Valley area identified as an area for green infrastructure enhancement in Policy CS9 of the Core Strategy, offer sufficient protection from unwanted development, in my view. LGS designation is not justified.

- 4.21 Sites 8, 9, 10 and 21 adjoin each other and are located within the settlement boundary, close to the school, church and A14 road. Collectively, they provide 11.4 acres or 4.6 ha of space. As I saw at my site visit, the church and school have their own open space so that this is not an intensively developed part of the Town. I accept that the cricket pitch and Community Nursery off Park Lane are demonstrably special and meet the other criteria for LGS in paragraph 77 of the NPPF. However, I consider that sites 9 and 10, being subsidiary and informal areas of open space, are of less importance and should not have the same high level of protection.
- 4.22 Site 12, Wigmore Meadows, as I saw at my site visit, is a pleasant area of open space with play facilities and tree planting which abuts the residential area to the east. It is a site of 10 acres or 4 ha, which is relatively extensive compared with the other proposed LGSs in Godmanchester. For example, it is nearly three times the size of the cricket pitch. More importantly, it is outside the settlement boundary in the countryside, and I consider that its designation as LGS is not justified. Site 15, Judith's Field, occupying some 6.9 acres or 2.8 ha between the A1198 and College of Animal Welfare, is described as special as a recreation and play space, with a purpose-built community use recreation building. The site is relatively close to Bearscroft Farm where significant new development is taking place, so that Judith's Field will become more centrally located in the Town's built-up area in the future, and will serve a larger catchment population. I accept that it is important to the local community, meets the criteria in the NPPF, including being local in character, and should be designated as a LGS.
- 4.23 From my site visit and from the information in Appendix 1 of the GNP, I am satisfied that sites 11- the Green between Cob Place and Fishers Way, 13 - Devana Park, 14 - Buttermel, 16 - site of former Methodist Church, 17 - War Memorial and 18 - allotments, and 20 - Rovers football ground, should be designated as LGS. Overall, with the cricket pitch, nursery and Judith's Field, I consider that 10 of the 18 sites listed in Appendix 1 of the GNP should be designated as LGS. The other 8 sites should be considered as other green space and listed accordingly in Appendix 1. Their "demotion" does not mean that they are unimportant as areas of open space. I recommend that **PM12** be made to confirm this, so that the Plan has regard for national planning policy. On Policy GMC3, it is essential that the policy relating to LGS designations, which is very protective and consistent with policy for Green Belts, is distinguished from policy for the other green spaces in Godmanchester. Having regard for national

planning policy and the contribution to the achievement of sustainable development, Policy GMC3 and its supporting text should be re-written, as set out in **PM3**.

- 4.24 I consider that Policies GMC4: Landscaping and planting, GMC5: Making the most of waterside assets, and GMC6: Improving and increasing public green spaces are commendable and consistent with high quality urban design in Godmanchester. They should promote sustainable development. Figure 2, which shows green space provision and needs, provides useful information against which development schemes can be assessed. I am also supportive of Policies GMC8: Ensuring public amenity space is retained and GMC9: Ensuring a wide range of sporting and recreational facilities are retained and expanded. They are consistent with the promotion of health and well-being as referenced in the NPPF's paragraph 171. The above policies further align with the aims of Policy LP11: Design implementation, in the emerging Local Plan.
- 4.25 Policy GMC7 supports development proposals that provide walking routes and enable access to the wider countryside, which has regard for paragraphs 69 and 75 of the NPPF. However, the designation of off-the-leash dog walking areas is not a matter for planning, in my view. Paragraph 173 of the NPPF cautions that Local Plans should be deliverable and developments should not be subject to such a scale of obligations and policy burdens that their viability is threatened. Prospective developers may regard the need to investigate the case for, and provide safely for, off-the-leash walking areas as too onerous. I appreciate from my site visit that there are many dog-owners in the GNP area who need to walk their dogs routinely and partly off-the-leash. However, the requirements for dog-walking should be addressed by community action and regulations/byelaws outside town planning. I consider that Policy GMC7 and its supporting text should be modified to prioritise improvements to the pedestrian access. The environment for dog-walkers should be mentioned in the Plan as a secondary matter only. **PM4** is needed so that regard is had for national planning policy.
- 4.26 The "semi-rural village feel" to Godmanchester is closely connected to its history, and the retention of so many old routes (from Roman times onwards) and buildings (around 125 listed buildings). Section 5 of the GNP addresses Heritage and the Built Environment, referring to the Town's "historic core" and rich architecture which will need to be protected as the Town changes over time. Map 5 on Page 68 of the GNP shows the historic core, which is referred to within Policies GMC10 and GMC11. Paragraph 5.2, correctly and commendably in my view, states that the brevity of section 5 is due to the fact that many of the Town's historic and heritage assets are covered by national policy, notably the Planning (Listed Buildings and Conservation Areas) Act 1990. The GNP does not intend to duplicate higher level law and policy, but it does recognise the importance and value of its historic assets.

- 4.27 I asked the Town Council to explain how its historic core had been defined, in my letter of 24 July 2017. I was informed that consultation with local residents, the location of two Conservation Areas and over 100 listed buildings had been used to define the area. Based on this evidence and my site visit, I support the area as shown on Map 5, but consider that readers and users of the GNP would be assisted if the boundaries of Post Street and Earning Street Conservation Areas, and of the Scheduled Monument east of the parish church, were also shown on the map. This could strengthen the effectiveness of Policies GMC10, GMC11 and GMC12, giving due prominence to conserving and enhancing the historic environment in general conformity with Objectives 8, 10 and 11 of the Core Strategy, and they reflect the aims of Policies LP34 and LP35 of the emerging Local Plan. **PM11** also has regard for section 12 of the NPPF, and should be made.
- 4.28 As long as the modifications described above are in place, I conclude that the GNP's policies to protect the semi-rural character of the Town and the surrounding countryside are proportionate, take account of the Town's history and heritage appropriately, and are compliant with the Basic Conditions for neighbourhood planning.

Issue 3: Transport

- 4.29 Chapter 8 of the GNP – Getting Around – explains that transport and traffic are major concerns for residents. The vision for the GNP, in summary, is to improve safety on the roads, encourage sustainable travel by cycling, walking or on the bus, and manage parking better. Problems with congestion due to proximity to the A14 and Huntingdon, and dependence on the Medieval Bridge across the River, are described in the text preceding Policy GMC22: Reducing traffic and congestion on Godmanchester's roads. Cambridgeshire County Council's Transport Assessment Team (County Council) broadly supports the vision and objectives of the GNP.
- 4.30 However, the County Council stated that the GNP should reflect the policies and objectives of the Cambridgeshire Local Transport Plan (LTP3) and the Huntingdon and Godmanchester Market Town Transport Strategy. The LTP3 dated July 2015, sets out policy for Cambridgeshire to 2031. It begins by defining eight challenges which, I agree, are broadly reflected in the vision within the GNP. The Strategy in LTP3 is to achieve the defined objectives, particularly tackling climate change and enhancing the economy. It aims to address existing transport problems, cater for the transport needs of new communities and improve air quality. Notably, it seeks to widen the choices available for environmentally sustainable transport, and manage the demand for transport, particularly private car use. On sustainable transport, it goes on to describe the Manual for Streets 1 & 2 "user hierarchy" which places pedestrians first, followed by cyclists, public transport, specialist service vehicles and disabled drivers, ending with other motor vehicle users.

- 4.31 The Huntingdon and Godmanchester Market Town Transport Strategy provides more specific policy for the GNP area. It expects all planning applications for major developments to carry out a full transport assessment highlighting specific impacts from their schemes on the local transport network. It references the improvements which are expected from the Bearscroft Farm (Romans' Edge) development, notably higher frequency bus services with better real-time passenger information between Godmanchester and Huntingdon, and monitoring of traffic flows on the Post Street corridor to inform traffic management measures. The Strategy for the area is to effect a modal shift towards more sustainable forms of transport with a particular focus on the daily commute. Greater levels of high quality cycle parking provision are to be sought in Godmanchester, among other places. A number of short term transport measures are described and costed, beginning with traffic calming measures for Post Street and The Causeway; "along with surfacing and lighting improvements to NCN51 and Cambridge Road".
- 4.32 The Market Town Transport Strategy also describes public transport schemes for the short, medium and long term, before moving on to road network and parking issues. The proposed new bypass to the A14 is expected to "significantly reduce the amount of traffic in Huntingdon, Godmanchester and surrounding villages and remove current rat-running to avoid the existing route". The County Council and Huntingdonshire District Council see the removal of the A14 viaduct over the railway line as a vital component of the scheme. The new A14 scheme is viewed as an opportunity to reduce traffic on the narrow and historic Town Bridge between Huntingdon and Godmanchester. However, the Transport Strategy acknowledges that some parts of the local road network which lie in close proximity to growth sites, will receive a significant increase in vehicular trips. "Furthermore, the A14 scheme itself may prompt a culture of rat-running through certain wards." On parking, it is acknowledged that there is significant local concern about on-street parking, and lack of off-street parking, in Huntingdon and on key routes through Godmanchester. The primary policy for a number of years has been to remove long-stay parking sites from the town centre to encourage travel there on foot.
- 4.33 I have included the above fairly lengthy summary of the two documents, in order to indicate the extent to which the GNP does or does not reflect the County Council's transport strategy. I note that Cambridgeshire Long Term Transport Strategy and the Huntingdon and Godmanchester Market Town Transport Strategy are referenced in paragraph 8.12 of the GNP, but consider that it should explain the role of the County Council and its policy documents more clearly. The introduction to Chapter 8 should also declare its support for the promotion of sustainable transport, explain that the Transport Assessment process and Travel Plans can mitigate the specific impacts of developments, and amend the reference to public transport services, as requested by the County Council Transport Assessment Team. These modifications would ensure that due regard has been had for the NPPF, paragraphs 29 - 41. The NPPF affirms that

reducing the need to travel, especially by private car, contributes to wider sustainability and health objectives, supports reductions in greenhouse gas emissions and reduces congestion. **PM9** would ensure appropriate regard for national policy, and should be made.

- 4.34 For similar reasons, I consider that Policy GMC22: Reducing traffic and congestion on Godmanchester's roads should refer to improving the provision of sustainable transport. It should also refer to the use of Travel Plans to set out how the use of sustainable modes will be facilitated and encouraged, having regard for paragraph 36 of the NPPF. PM9 would secure this. The County Council requested that the significant benefits of having a town with high levels of cycling should be set out in the section which begins on Page 54 of the GNP. I recommend that paragraph 8.13 be extended to provide additional information on this subject, which again relates to sustainable travel practice. I shall also propose additional information about the approach to cycle parking. **PM10** should be made to help contribute to the achievement of sustainable development.
- 4.35 I consider that Policies GMC23: Improving cycling, GMC24: Encouraging greater take up and provision of public transport, and GMC25: Making it easier to get about on foot are consistent with promoting sustainable travel. Paragraph 8.30 and Appendix 4 helpfully give details of public rights of way, which will need to be considered at an early stage in any development proposals. These policies align with Policy LP15 of the emerging Local Plan and have regard to national planning policy.
- 4.36 Page 39 onwards of the GNP concerns parking. As the County Council Transport Assessment Team observed, parking standards are set by the local planning authority. The County Council cautions against over-provision of car parking spaces. Notwithstanding the existing problems with parking in Godmanchester, notably within the historic core, I consider that generous allowance for residential or other parking in new developments, as implied in Policy GMC14, is only likely to increase the number of vehicles on the roads, and undermine efforts to encourage use of more sustainable travel modes. The County Council favours the use of a bespoke level of parking for each proposed development, depending on its location and nature of development and the other criteria given in paragraph 39 of the NPPF.
- 4.37 Policy LP16 of the emerging Local Plan is a comprehensive parking policy, which includes provision for cycle parking, and refers to the Huntingdonshire Design Guide Supplementary Planning Document 2017. This is recently adopted, and I consider that it provides guidance which should ensure that new development proposals will achieve suitable and sensitive parking provision. Even if Policy LP16 and the Design Guide SPG are not identified as strategic policies of the development plan for the area, I consider that Policy GMC14 should be amended as shown in **PM6** in order to promote sustainable development and to have regard for the NPPF.

- 4.38 I support the principle of Policy GMC15 to enhance the appearance of the streetscene in the Town's historic core and minimise visual clutter. There is a minor typographical error in line 2 ("is" instead of "its") and I consider that use of the word "setting" could be misleading, as the "setting" of a Listed Building or Conservation Area refers to the land outside it. In this instance, I therefore recommend use of the word "surroundings", and have proposed this change in **PM7**. Providing all the above modifications are made, I conclude that the policies for transport meet the Basic Conditions for neighbourhood planning, notably for sustainable transport planning.

Other Matters

- 4.39 Flooding and surface water flood risk are addressed on Page 43 and in Policy GMC16 of the GNP. The Environment Agency's flood maps are referenced in the supporting text, as is the "ever-present threat" of flooding due to Godmanchester's location close to the River Ouse. The policy should alert developers to potential risks, and aligns with Policy LP9 of the emerging Local Plan, which sets strict, detailed tests for new development, in line with the NPPF.

5. Conclusions

Summary

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

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Godmanchester Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated neighbourhood plan boundary, requiring the referendum to extend to areas beyond the plan boundary. I recommend that the boundary for the purposes of any future referendum on the plan should be the boundary of the designated neighbourhood plan area.
- 5.4 Finally, I wish to commend the Godmanchester Town Council and its local community for the years of hard work which have been put into preparing

this Neighbourhood Plan, ensuring that local people were properly consulted and engaged, and informing themselves about the complex town planning system. Although some people will be disappointed by the modifications which are proposed in this report, which I am compelled to make to meet the relevant legal requirements, I hope they will appreciate that I am fully supportive of their aims for a compact town which maintains its distinctive and historic character set in the countryside, and will thrive in the future for the benefit of its residents and businesses. The GNP should provide a strong basis for good quality, decision-making on development proposals which take full account of the local community's wellbeing.

Jill Kingaby

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Front cover and Page 5	<p>Front cover should add Submission Version May 2017 (or the date of the final version of the Plan)</p> <p>Paragraph 1.1</p> <p>This document represents the Neighbourhood Plan for Godmanchester parish from 2016 2017 to 2036</p>
PM2	Page 22	<p>Policy GMC1: The importance of the countryside setting</p> <p>Development in the Godmanchester Neighbourhood Plan Area shall be focused within or adjoining the settlement boundary....</p>
PM3	Page 23	<p>Preserving the Semi-Rural Village 'Feel' within the Town</p> <p>4.14 There are ... connection for wildlife but also is crucial</p> <p>4.15 Delete the first sentence and insert:</p> <p><i>The Local Green Spaces within or adjoining the settlement boundary are listed in Appendix 1, and are demonstrably special to the local community of Godmanchester. Also in Appendix 1, are sites in the Parish designated for their national and international significance for wildlife and as registered Common Land. Thirdly, Appendix 1 lists other non-designated green spaces, many of which were allocated as public amenity spaces under planning permissions for development on neighbouring land. These are all sites of community value ie. they provide a</i></p>

		<p>valuable space for the informal recreational activities of the community such as walking, dog walking, informal play, sports or allotment gardening. They are</p> <p>Policy GMC3: Preserving ...Town Local Green Spaces.</p> <p>Godmanchester's designated Local Green Spaces and other Ggreen Sspaces are set out in Appendix 1. Proposals for development on the Local Green Spaces and Other Green Spaces will not be permitted unless it can be demonstrated Local Green Space or Other Green Space.</p> <p>Proposals for development on other green spaces should demonstrate that alternative informal recreational space is available within walking distance for neighbouring and future residents, and the semi-rural 'village' feel within the Town will not be seriously compromised.</p>
PM4	Page 30	<p>Paragraph 4.26 – add a second sentence as follows: The provision of public amenity space that would enable off-the-leash dog walking space will be supported.</p> <p>Policy GMC7: Providing designated spaces where dogs can be walked off-the-leash and i Improving access to the countryside</p> <p>Development proposals that take account of the need to provide green open public amenity space that is designated for off-the-leash dog walking will be supported, as will those that provide walking routes and enable ongoing access to the wider countryside.</p>
PM5	Page 38	<u>Residential Infill and Backland Development</u>

		<p>6.3 New opening sentence:</p> <p><i>New housing development of a moderate or minor scale is defined in Policy CS3 of the Core Strategy as developments of 10-59 dwellings and up to 9 dwellings respectively.</i> Back land development is defined</p> <p>6.6 The combined, cumulative effect of <i>new development including</i> back land and infill development is that This would not be appropriate in Godmanchester, <i>where care and attention to the scale, design and layout of new housing and its site context must be given.</i></p> <p>Policy GMC13: Residential infill and back land development.</p> <p>All residential infill and back land development within <i>or adjoining</i> the settlement boundary of Godmanchester should Sites within reasonable walking distance of the Town's historic centre will be favourably considered. <i>Development should be of minor or moderate scale, or represent infilling or back land development. Infilling or back land development</i> It should reinforce the uniformity of the <i>character of the existing streetscene</i> by reflecting the scale, mass, semi-rural nature of the Town, <i>with its historic core.</i></p>
PM6	Pages 39 to 41	<p>Improving Parking in the Town</p> <p>6.17 – delete the existing text and insert:</p> <p><i>New residential development in Godmanchester should include parking provision which is based on a careful assessment of the site's location and the character of the surrounding area, as well as the nature and form of the proposed development, and the size of the dwellings (number of bedrooms). Regard should be had for guidance on</i></p>

		<p>parking in the Huntingdonshire Design Guide Supplementary Planning Document 2017, when residential or other development proposals are put forward.</p> <p>Policy GMC14: For new residential development, plans should not exacerbate seek to reduce the any pressure on 'on street' parking and seek to improve parking issues through the greater provision of should provide numbers of off-street parking spaces appropriate to the site's location and the character of the proposal. The number of spaces should reflect the mix, size and type of housing.</p> <p>For new residential developments (Use Class 3)4 off-street car parking spaces.</p> <p>Parking spaces can take the form Local Planning Authority.</p> <p>(Modify footnote 44 to refer to Huntingdonshire District Council Design Guide 2017)</p>
PM7	Page 42	<p>Policy GMC15: Improving and Enhancing the Town</p> <p>Second line:</p> <p>...and to enhance its historic character. Where new provision is made, it should be in keeping with the setting its surroundings</p>
PM8	Page 51	<p>Policy GMC21: Growing new capacity for small scale businesses in the Town</p> <p>Modify the second bullet of the second sentence to read:</p> <ul style="list-style-type: none"> • Provision of new buildings or conversion of existing buildings within or adjoining the Settlement Boundary of the Town

PM9	Pages 52 and 53	<p>8 Getting Around</p> <p>8.1 Godmanchester is a growing community.....</p> <ul style="list-style-type: none"> • Improvemanage parking better in the Town. <p>8.2 With the anticipated improvements to the A14 road in Huntingdonshire and the levels of growth planned across for Godmanchester it will be important that developments each contributes..... a coherent and cohesive network transport system incorporating more sustainable transport measures and enabling which allows people to get around more easily and safely, we are thereby protecting should also be able to protect the historic and natural environment.</p> <p>8.2 a Cambridge County Council's Local Transport Plan (LTP3) 2015 and the Huntingdon and Godmanchester Market Town Transport Strategy seek to widen the choices available for environmentally sustainable transport, and manage the demand for transport, particularly private car use. All planning applications for development which would generate significant amounts of movement should be accompanied by a Transport Assessment, identifying the specific impacts of their proposals on the local transport network, and the measures needed to mitigate any adverse impacts. Measures should maximise opportunities for more sustainable transport eg. promoting pedestrian and cycling, and improving public transport services. Travel Plans should be provided for all developments which would generate significant new movements.</p> <p>.....</p>
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PM10	Page 54	<p>Make the Town Safer for Cyclists</p> <p>8.13, Add two new sentences to introduce this paragraph:</p> <p>Godmanchester is a small town within 3 miles of the centre of Huntingdon, and within the relatively flat countryside of Cambridgeshire. It represents a highly suitable environment for cycling for people living and working locally, and for tourists and visitors.</p>
PM11	Page 68	<p>Map 5 – Historic Core</p> <p>Modify the map so that it shows Post Street and Earning Street Conservation</p>

		Area boundaries, and the boundary of the Scheduled Monument east of the parish church.
PM12	Page 69	<p>Appendix 1 – Green Spaces</p> <p>Local Green Spaces</p> <p>Delete the following:</p> <p>4. The Godmanchester Nature Reserve at Cow Lane</p> <p>5. The Cow Lane gravel pits</p> <p>6. The Recreation Ground including the green spaces leading up to the lock</p> <p>7. Queen’s Walk</p> <p>9. The green space adjacent to the Cricket Pitch</p> <p>10. The land between the school, the Church ...</p> <p>12. The green ...Jarwood Walk and up to Silver Street ...</p> <p>19. The proposed Neolithic Country Park</p> <p>Godmanchester’s Other Green Spaces</p> <p>Modify the first sentence to read:</p> <p>These are not defined within the NPPF but those listed here are mostly small scale are within the settlement boundary the Parish and are important</p> <p>Add to the list of sites: Nos. 4, 5, 6, 7, 9, 10, 12 and 19.</p>