



The Old School House
37 Green End Road
Sawtry
Huntingdon
PE28 5UY

Tel: 01487 831771
Office Open 9.00 – 1.00 Mon - Fri
E mail: clerk@sawtry-pc.gov.uk
www.sawtry-pc.gov.uk

David Hogger BA MSc MRTPI MCIHT
Intelligent Plans and Examinations (IPE Ltd)
3 Princes Street,
Bath
BA1 1HL

30 June 2023

Dear Mr Hogger

RE: Independent Examination of Sawtry Village Neighbourhood Plan Examination

Sawtry Parish Council and Huntingdonshire District Council received procedural matters and questions on 8 June 2023. Please find below the response by Sawtry Parish Council, as requested to questions 5 to 25 of the procedural matters and questions with some additional commentary.

5. Objective 6.2.10 (page 21) refers to enhancing the personal safety of individuals. How does the Parish Council envisage that this objective will be successfully achieved?

Comment: The Parish Council consider that a variety of measures will be needed to enhance the personal safety of individuals. New developments should provide the means to enable progress such as designing layouts that promote opportunities for natural surveillance, ensuring that pedestrian linkages are well lit, and avoiding the potential for anti-social behaviour. The aim being that development is safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. Opportunities to promote social interaction will be taken in existing and new development. In the existing village, these will include the provision of CCTV equipment in a number of locations such as St Judith's Field and the Green, additional street lighting and traffic speed monitors. As part of ensuring that the existing built environment is safe and accessible and that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion, publicity will be used including social media to publicise areas prone to anti-social behaviour or crime and disorder and to provide advice on precautions to promote personal safety.

6. Could the Parish Council confirm that all the owners of the proposed local green space (policy SNP1 on page 23) have been advised of the proposed LGS designations and that no objections were received (having regard to the advice in the PPG on Open space, sports and recreation facilities, public rights of way and local green space: Ref ID: 37-019-20140306).

Comment: All owners of the proposed Local Green Spaces have been notified of the proposed LGS designations with the exception of area 40 (part of LGS13) and area 63 (part of LGS17) where it has not been possible through a proportionate and reasonable search exercise to be able to establish actual ownership. Area 40 is part of a wider area owned by HDC so is considered most likely to be under the control of HDC. As detailed in the Local Green Evidence document engagement was undertaken with the owners of the proposed LGSS before the Draft Neighbourhood Plan was published. Engagement with other various owners of green areas not identified as LGS also occurred during the Regulation 14 consultation. The 17 proposed LGSS for designation were put forward for non-statutory early public consultation using the Sawtry Eye Magazine as a specific exercise prior to finalising the draft Plan. Planning Practice Guidance indicates that landowners should be notified at an early stage, but it does not require landowners to agree and is explicit that opportunities for landowners to make representations are present during the formal consultation process on the draft plan.

The 17 proposed LGSs for designation were put forward in the Draft Neighbourhood Plan for public consultation. At the draft plan stage, the Middle Level Commissioners did not object to LGS2, LGS4, LGS5, LGS6, LGS9, LGS15, LGS16 and LGS17. Instead, they commented wanting to ensure that the policy allowed for the possibility of surface water infrastructure; they went on to highlight a number of future schemes they might like to pursue on LGS areas both within their control and those not controlled by them if funding could be secured in the future, although none of the potential future projects is in any delivery programme. The policy was amended in specific response to their comments to include reference to 'Proposals to use the areas of Local Green Space for biodiversity enhancement or surface water flood risk attenuation and associated infrastructure will be supported in principle where this does not conflict with their demonstrably special significance'. This fully addressed their comment at the Regulation 14 stage; however the Middle Level Commissioners have now changed their stance and at the Regulation 16 stage have decided to submit objections to LGS2, LGS4, LGS5, LGS6, LGS9, LGS15, LGS16 and LGS17. Many LGS areas in Sawtry provide a multi-faceted role such as for surface water attenuation, biodiversity, quiet reflection and leisure/recreation. Such a combined role for LGS areas will continue in the future and potential operations for surface water attenuation at some point in the future in LGS areas would not be inconsistent with or be prevented by the LGS designation.

7. I shall visit the proposed local green spaces, but I notice that site LGS2 Land off Bramble End and Monks Way does not include the adjacent pond and surrounding space (see page 66). Is this land privately owned, afforded protection by other policies or would its designation not meet the criteria for LGS as set out in the NPPF?

Comment: Visits to the Land off Bramble End and Monks Way led to the conclusion that the overall area does not operate as a single area that performs a multi-functional role, but is instead an area with two quite distinct zones. The pond and its surrounding space which operates as an attenuation pond has an operational character that lacks features of special significance; furthermore, for much of the time the pond (and certainly during our visits) was dry and overgrown, detracting from the adjacent area. It has a rather neglected appearance. For these reasons, the pond was not included in the proposed LGS2.

8. The District Council (Ref: SNPS:9) suggests amendments to the area of LGS9 and the inclusion of two other areas of Local Green Space. Would the identification of this additional LGS meet all the requirements for such designation as set out in the NPPF and if so, where is the evidence that these areas have been given the same consideration as other LGS, including in terms of consultation with the land - owners?

Comment: LGS9 satisfies the requirements for designation as a Local Green Space by meeting all five special significance criteria. It is a popular walking route and provides a habitat for wildlife. In due course, it is hoped there will be access connections to the new Glatton Road estate which is expected to start construction shortly. However, although open space is proposed in the layout for the new estate this could still be subject to change through variations until construction has actually take place. The NPPF in paragraph 102 appears clear to the Parish Council that LGS is only intended to cover existing green spaces that are demonstrably special to the local community. LGS is not intended to cater for future areas of green spaces that do not currently exist, even if they are planned. In addition, it is difficult to see a connection with LGS4 and LGS6 which are not in close proximity and not readily accessible from LGS9. LGS4 and LGS6 qualify as standalone Local Green Spaces in their own right. In the future, if green space within the new Glatton Road estate can meet the LGS criteria then they can be considered in a future review of the Neighbourhood Plan; including an assessment of whether a number of LGS areas form a network of green spaces. In any event to the best of our knowledge HDC has not engaged with the landowner regarding the possibility of LGS designation, and the Parish Council have not engaged with the landowner.

9. In the third line of policy SNP3 (page 25) should the word 'or' be replaced by the word 'and'?

Comment: The intention of the wording 'additional parking **or** drainage measures' was to support proposals based on either a single improvement (parking or drainage) or a combination (parking and drainage). The

conjunction 'and' could imply that both improvements would be needed in any proposal. The wording could perhaps be clearer if it said 'and/or'.

10. *Is there any reason why the community facilities listed in the last paragraph of policy SNP5 (page 29) are not identified on the Policies Map?*

Comment: Where specific proposals are identified, maps have been included. The community facilities listed in the final paragraph of policy SNP5 reflect the types of community facilities listed in paragraph 6.45 of Local Plan Policy LP22. Due to the size and shape of Sawtry the scale of OS mapping base that shows the entire settlement is not ideally suited to showing the precise boundaries of community buildings. It would be possible to identify on a map the general location of the main community facilities in the same manner as was done in The Stukeleys Neighbourhood Plan if that was considered helpful.

11. *Policy SNP11 (page 37) refers to the 'Built-up Area' and 'Established Employment Areas' but they do not appear to be identified on the Policies Map. Where are the boundaries of these areas identified?*

Comment: Local Plan Policy LP18 page 91 designates Brookside Industrial Estate and the Black Horse Business Park as Established Employment Areas; their boundaries are shown in the map on page 36 of the SNVP as an extract from the Local Plan Policies Map. The term built-up area is defined in paragraph 4.80 of the Local Plan and amplified in the subsequent paragraphs. Local Plan Policy 8 then applies the built-up area context to Sawtry as a Key Service Centre.

12. *The British Horse Society (Ref: SNPS:30) is concerned that there is no reference to improving 'links' between Sawtry and the surrounding countryside for use by walkers, cyclists and horse riders. Is there any reason why an appropriate reference to such improvements could not be made and if so, could appropriate wording be suggested?*

Comment: Policy SNP8 'seeks to promote active travel opportunities across Sawtry' – the intention being to mean the Parish of Sawtry and not just the settlement boundary. Although the reach of SVNP is limited to its Designated Area, this Policy would support proposals from parties such as local landowners, Huntingdonshire District Council and Cambridgeshire County Council which developed or improved sustainable transport infrastructure, thereby providing links into the wider community. Thus, apart from perhaps including 'Sawtry Parish' in the Policy statement, further changes should not be necessary. It is noted that in other Neighbourhood Areas on the issue of equestrians HDC has indicated that they consider that matters relating to equestrians are already adequately addressed by Policies LP4 and LP16 of the Local Plan and the Developer Contributions SPD.

13. *The British Horse Society (ref: SNPS:31) suggests the inclusion of text regarding the needs of all Non Motorised Users (paragraph 6.2.8 on page 21). What is the Parish Council's response to this request?*

Comment: The objective in paragraph 6.2.8 refers to sustainable transport method which, in the Glossary, is defined as 'any efficient, safe and accessible means of transport...'. Walking and cycling are cited as examples, but riding horses (and ponies) could fall under the same type of scope. However, the NPPF refers in section 9 to promoting sustainable transport, and that is where the terminology has been derived from. At the Regulation 14 stage HDC and CCC wanted reference to active travel which was included; the NPPF in paragraphs 104 c) and 106 d) place a focus of sustainable transport being on walking and cycling but does not mention equestrian use. The objective is focussed principally on movement associated with more functional activities such as accessing education, work or services/facilities; it is not really dealing with transport for recreation or leisure. It is not clear whether the expression 'non-motorised users' is widely recognised or even required in this context and would add unnecessary complexity. Thus, it is not considered necessary to amend the text as suggested as the current working is sufficient.

14. *The District Council suggests the deletion of paragraphs 4.1 to 4.6 relating to the preparation of the SVNP (ref: SNPS:7). What is the opinion of the Parish Council on such a deletion?*

Comment: The purpose of including Section 4 was to highlight the difficulties and obstacles encountered by Sawtry Parish Council and the Neighbourhood Planning Group from the outset of the project. The problems undoubtedly extended the project duration and explained the wide range of measures needed to ensure adequate coverage both in publicising the project and in consulting stakeholders in the community. HDC do not identify that any of the text fails to meet the basic conditions. Although there is no serious objection to the deletion of Section 4, its explanation for the measures adopted in paragraph 5.1 would be lost.

15. *The District Council (ref: SNPS:8) suggests an amendment to paragraph 7.1.2 on The Built Environment (page 21). What is the Parish Council's response to this suggestion?*

Comment: SNPS:8 suggests extending the penultimate sentence in paragraph 7.1.2 page 21 of the SVNP with the underlined phrase in brackets to read: 'This includes addressing windfall housing proposals and potential rural exception sites (which could be considered in Sawtry if there is local needs evidence).' We are content to agree this suggestion.

16. *The District Council suggests amendments to make reference to funding for the improvement of Greenfields (Ref: SNPS:10). Is such a reference necessary to meet the Basic Conditions and if so, could appropriate wording be formulated?*

Comment: The project to enhance the Greenfields sports facility is now moving ahead firmly; we can certainly add a note in the SVNP paragraphs 7.3.2 (page 25) and 12.8 (page 60) to reflect the factual position that a financial contribution from planning application 20/01407/OUT (for Glatton Road) allocates funding of £216,977 towards improvements to Greenfields.

17. *The District Council (Ref: SNPS: 11) suggests amendments to policy SNP3 – recreation and leisure (page 25). Are such changes necessary to meet the Basic Conditions and if so, could the Parish Council formulate appropriate wording?*

Comment: Policy SNP3 flows from NPPF paragraph 32 and Local Plan Policies LP22 and LP23 as stated in paragraph 7.3.5.1. The policy was reformatted following the same comment made by HDC at the Regulation 14 stage. The policy is in our view already sufficiently clear, and the first paragraph of the policy only deals with proposals relating to Greenfields including allocating the land to extend Greenfields. The second paragraph of the policy is then intended to cover in brief terms general support for any other sporting, recreational and leisure applications across the entire parish that is not related to Greenfields. In relation to these other locations it is not intended to provide any criteria beyond general support as that can be addressed by other development plan policies. The Policy wording in relation to Greenfields does refer to 'new or enhanced community facilities for recreation and leisure', and it could perhaps be amended to say 'new or enhanced community facilities for sport and recreation' to avoid any concern that it could have in mind wider leisure types of activities such as cinema which is not the intention. In relation to the two paragraphs heading could be added such as 'Greenfields' and 'Other Locations' for completeness but the policy is already considered to be clear.

18. *The District Council suggests amending the wording of policy SNP4 (page 26) – Medical and Health (Ref: SNPS:12). Does the Parish Council agree that this is necessary to meet the Basic Conditions?*

Comment: The wording of the second paragraph in Policy SNP4 involves poorly used and not viable as being constituent parts of the same criterion. The policy is written in a sentence format and it could be clarified by moving to a bullet point format to read as follows: 'Development proposals that would result in the loss of medical and health facilities will not be supported unless:

- it can be shown that they are poorly used, not viable in terms of community demand, or need that specific type of primary care service; or
- adequate replacement provision is made elsewhere nearby within or close to the community served by the geographical catchment for the specific medical and health facility.'

19. *The District Council suggests amendments to policy SNP5 on Community Facilities (page 28) and the associated supporting text (Ref: SNPS: 13). Does the Parish Council agree that these are necessary to meet the Basic Conditions and if so, could appropriate revised wording be formulated?*

Comment: The first paragraph of Policy SNP5 deals with the improvement and expansion of existing community facilities and with the provision of new facilities. The second paragraph is in our view already clear that it relates to enabling development associated with the existing community facility. For absolute clarity the text could be added to read: 'Proposals which look to develop or replace existing community facilities through enabling development on part or all of the land or buildings occupied by the existing community facility will be supported...'

In response to Q10 we have already said it would be possible to identify on a map the general location of the main community facilities in the same manner as was done in The Stukeleys Neighbourhood Plan if this was considered helpful. This could identify the CARESCO facilities.

As identified, the wording of the final paragraph follows wording used in another neighbourhood plan, as with Policy SNP4, the policy final paragraph is written in a sentence format. If necessary, it could be clarified by moving to a bullet point format as follows:

'Development proposals that would result in the loss of community facilities: (places of worship; public houses; allotments; recreation or sports facilities; shops; halls or meeting places; community centres; library; or play areas) will not be supported unless:

- it can be shown that they are poorly used, not viable in terms of community demand/needs; or
- adequate replacement provision is made elsewhere, nearby, within or close to the community served.'

20. *The British Horse Society suggests amendments to paragraphs 7.4.1, 7.4.2 and 7.4.3 on page 31 (Ref: SNPS: 32). Does the Parish Council agree that these are necessary to meet the Basic Conditions?*

Comment: The Parish Council do not consider that any amendments are necessary to meet the basic conditions, The NPPF in paragraphs 104 c) and 106 d) place a focus of sustainable transport being on walking and cycling but does not mention equestrian use. This part of the SVNP is focussed principally on movement associated with more functional activities such as accessing education, work or services/facilities; it is not really dealing with transport for recreation or leisure per se. It is noted that in other Neighbourhood Areas on the issue of equestrians HDC has indicated that they consider that matters relating to equestrians are already adequately addressed by Policies LP4 and LP16 of the Local Plan and the Developer Contributions SPD.

21. *The District Council suggests amendments to policy SNP8 (page 32) and the supporting text regarding footpaths and cycle ways (Ref: SNPS: 14). Does the Parish Council agree with these amendments and if so, could appropriate revised wording be formulated?*

Comment: The Parish Council have no objection to the suggested revised wording of the second sentence in the first paragraph in policy SNP8. In relation to the final sentence of the first paragraph, it is clear that it is not a closed list for what the policy covers, and it is highlighting a subset of potential schemes that would be particularly supported. Indeed, this is supporting the point of integration between the existing built environment and new development through green spaces that HDC were raising in SNPS9 with regard to LGS9. The supporting text already in paragraph 7.4.6 already refers to the documents that HDC identify.

22. *The British Horse Society (Ref: SNPS: 33) proposes amendments to the supporting text with regard to enhancements to Rights of Way. Does the Parish agree that these are necessary to meet the Basic conditions and if so, could appropriate wording be devised?*

Comment: There is no locally distinctive issue in Sawtry relating to the needs of equestrian users. The British Horse Society are seeking various upgrades of rights of way within the Parish. A neighbourhood plan is not a rights of way improvement plan and the rights of way system operates under a separate legislative regime and as such the scope of what is being suggested falls outside the legal scope of the Neighbourhood Plan. It is considered that the broad scope of equestrian users is already adequately addressed by Policies LP4 and LP16 of the Local Plan and the Developer Contributions SPD.

23. *Policy SNP10 Safer Communities (page 35) does not make it clear how a decision maker should interpret the requirements of the policy or how conclusions regarding the implementation of the policy can be satisfactorily drawn. For example, how would a decision maker judge whether or not a place would be 'safe'; whether or not community cohesion would be achieved; and whether or not the personal safety of individuals would be enhanced? Can the Parish Council consider providing amended wording that requires an applicant to demonstrate how their proposal will result in a safer community.*

Comment: SNP10 intends to improve matters by using the relative term 'Safer', as it could be argued that absolute safety would be an unrealistic goal. The Local Plan contains no policy on looking at community safety. Paragraph 5.30 of the Local Plan states that good design helps ensure the successful integration of new development into existing neighbourhoods through taking account of community and individual safety considerations and minimising opportunities for crime. Albeit that it gives no further details, Policy LP29 of the Local Plan looks for health impact assessments to demonstrate safe, healthy and inclusive communities but this only covers large-scale new developments. The NPPF looks for the promotion of healthy and safe communities. The HDC Design Guide SPD references safety; there is also a specific section on safety and crime prevention.

The Policy could be added to along the following lines: 'Development proposals will be supported which aim to achieve safe places and which avoid the fear of crime and disorder. Development should facilitate social interaction and community cohesion alongside a healthy and safe environment which enhances the personal safety of individuals. This can be achieved through the use of attractive, well-designed, clear and legible pedestrian and cycle routes which are appropriately lit and are subject to natural surveillance arising from the layout including active frontages. Layouts should create safe, overlooked, attractive, convenient, and well-connected streets and spaces. In addition, public space should be of high quality, which encourage the active and continual use of public areas by all age groups; open space should not be located in left-over areas but should instead be integral to the overall layout and should be subject to opportunities for natural surveillance. Landscaping should be carefully planned so as to not create future fear of crime and disorder or anti-social behaviour. Proposals which involve measures to install CCTV, lighting or other measures to improve public safety will be supported.'

Additional text could be added to the supporting text as a new paragraph between 7.4.13 and 7.4.14 along the lines of 'The Parish Council consider that a variety of measures will be needed to enhance the personal safety of individuals. In new development this will include designing layouts that promote opportunities for natural surveillance and ensuring that pedestrian linkages are well lit and avoid the potential for anti-social behaviour. The aim to be that development is safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. Opportunities to promote social interaction will be taken in existing and new development. In the existing village, these will include the provision of CCTV equipment in a number of locations such as St Judith's Field and the Green, additional street lighting and traffic speed monitors. In many cases this type of infrastructure does not need planning permission but in some circumstances planning permission is required and in those cases proposals will be supported. As part of ensuring that the existing built environment is safe and accessible and that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; publicity will be used including social media are employed to publicise areas prone to anti-social behaviour or crime and disorder and to provide advice on precautions to promote personal safety.'

24. *The District Council suggests that in order to meet the Basic Conditions, the wording of policy SNP 11 (regarding Business and Employment) on page 37 (and its supporting text) should be amended (Ref: SNPS: 17). Does the Parish Council agree and if so, could appropriate alternative wording be provided?*

Comment: SNPS:17 calls for amendments to the wording of Policy SNP11 and further clarifying text. The policy was previously amended to include some reference to scale in response to concerns from HDC at the Regulation 14 stage that no mention of scale could lead to possible large scale development to the east of the A1M. It is surprising therefore that this concern still remains. The Local Plan in policies LP8, LP18 and LP19 sets out no strategic policy framework that limits the scale of proposal that would be acceptable, with the exception of a 600m² on office floor space. Otherwise, the only obligation is that a proposal immediately adjoins and is capable of being integrated with an Established Employment Area. This could theoretically be

met as a provision by accessing a new site through an existing site, but could be many times larger than the existing site. As such the Neighbourhood Plan cannot be considered not be in general conformity with the strategic policies of the Local Plan. The Neighbourhood Plan in fact looks to ensure that scale is an issue that will be considered in order to prevent a disproportionate extension of the employment area to the east of the A1M. The wording of Policy SNP11 is considered to be locally distinctive and appropriate having regard to the NPPF and the Local Plan.

The policy looks for preference to be given to development in the Black Horse and Oakwood Business Parks over Brookside Industrial Estate, the rationale for this is explained in paragraph 7.5.4. If some additional criteria are considered necessary then the second paragraph of the policy could be added to as follows: 'The Neighbourhood Plan looks to encourage proposals that comply with development plan policies connected with the Established Employment Area at Black Horse Business Park and the permitted Oakwood Business Park of a scale that reflects the surroundings to the east of the A1M in preference to proposals connected with the Established Employment Area at Brookside Industrial Estate. Brookside Industrial Estate which although is a defined Established Employment Area is not ideally located. Proposals at or relating to Brookside Industrial Estate will need to demonstrate that traffic movements, particularly HGV movements that would need to go through Sawtry or Glatton would not lead to unacceptable impacts on the historic environment, living conditions including from noise and disturbance, air quality and highway and pedestrian safety within the villages. Proposals for high-quality and professional occupation employment such as research and development that would diversify the existing local employment provision would be particularly supported.'

25. *A number of representations were submitted by the Middle Level Commissioners. Is the Parish Council satisfied that the issues they address are adequately covered by other planning policy documentation at local and national level?*

Comment: The Parish Council are satisfied that the issues raised by the Middle Level Commissioners are satisfactorily addressed in legislation and/or section 14 of the NPPF and Local Plan policies LP 5 Flood Risk, LP 6 Waste Water Management, LP 15 Surface Water, LP 30 Biodiversity and Geodiversity, and LP 38 Water Related Development.

Yours sincerely,

John Potter – Sawtry Parish Councillor