

Histon & Impington Neighbourhood Plan**Policy HIM08 –Observations and Suggested Changes**

1) We note that The Planning Bureau Limited, on behalf of Hain Daniels and McCarthy & Stone, were content with the Submission Version of the Neighbourhood Plan and “*didn’t consider it necessary to make further comment*” (The Planning Bureau Letter of 21 October 2019 refers).

2) We also note that The Planning Bureau Limited and Hain Daniels Group identified issues with the Statement of Common Ground. In their comments, while there is a general reference to changes, specific reference is made to the area which currently is not built upon in the north and west of the Jam Factory site.

In the Statement of Common Ground this was shown in Map 12 as “Green areas to be retained”. The area shown in green on the ‘regulation 14’ consultation version (ie Version 2) was the source.

It was subsequently recognised that this went beyond clarification of the intent of the Policy and in the Parish Council response of 5 November 2019 it was suggested that the legend be amended to “Existing green areas”.

3) We now understand that there are extant planning permissions applicable to the area for open storage and car parking; therefore, it is inappropriate to define these as green areas for the purpose of Policy HIM08. **We now suggest the shading on Map 12 within the site boundary remains as in the Submission Version so there is no specific reference to green areas within the site.**

We note that the planning permission requires a landscaped bund along the north-eastern boundary to protect the amenity of local residents (with replanting of dead, damaged or diseased specimens being required for a limited period post development).

4) In their letter of 26 October 2019, The Planning Bureau Limited made available a copy of an Ecology and Protected Species Survey undertaken in August (birds and badgers) and September 2019. They drew attention to the conclusion that “*no ecological constraints were identified that would prevent the site¹ from being developed provided the relevant precautionary measures were employed and ecological enhancements incorporated*”.

We welcome the recognition of the need for both precautionary measures and ecological enhancements.

We also welcome the statement of intent in The Planning Bureau Letter of 21 October 2019 that their “*proposals which will safeguard the Jam factory as an important local employer but also deliver much needed housing for older people on surplus land adjacent to the factory along with a number of other local benefits which include;*

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- *Providing natural habitats which will be properly managed to deliver biodiversity benefits*
- *Maintaining a more effective ‘buffer’ between the factory and existing residential areas and improvements to local pedestrian links.”*

5) The Ecology and Protected Species Survey suffers several limitations as a consequence of which it does not provide a comprehensive assessment of the ecology of the site. These are:

- The bird survey (14th August) was at the end of the bird breeding season, undertaken outside the March to June period which good practice dictates².

¹ In the context of this ecology survey, “site” refers to an area in the north and west of the overall Factory site.

² This is readily seen by reference to ecology survey planning calendars.

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Some birds will still be breeding in August, but some summer migrants will already be on migration and some residents will be much less visible having started their post breeding moult.

- Not all the site was accessed – notably the mature hedge along the western boundary (see page 9)
- The survey was narrowly focused: for example, invertebrates were not considered (pages 1 and 17)

Therefore, instead of stating in the conclusion *“no ecological constraints were identified”* it would be more correct to say that **in respect of bats, badgers, late-summer breeding bird species, and habitats and plant species no ecological constraints were identified in the area surveyed.**

- The value of the site in other seasons was not assessed – which is relevant for invertebrates and wintering / migrating birds, for example.
- Inferences were made about the ecological suitability of the neighbouring area which should be revisited (page 11).

For example, the adjacent residential area was stated as having *“low potential for foraging and commuting bats”*. Common pipistrelle forage in a residential area some 150 m north east of the site with nightfall flight patterns indicating the bats might have originated in, or passed through, the region of the site.

- The assertion (page 10) that development would be unlikely to impact negatively on the nature conservation interests of the deciduous woodland and traditional orchard priority habitats adjacent to the site is not supported by evidence.

6) The second paragraph of the Policy states: *“A key consideration in any proposal is the biodiversity value of the wildlife-rich scrub in the western part of the site which is ecologically linked with the adjacent land to the west.”*

Since the Submission Version was issued, scrub has been cleared. Whilst such scrub has wildlife value, and in recognition of the statements noted above given by The Planning Bureau Limited, we suggest the sentence in the Policy would be better if recast as follows:

“A key consideration in any proposal is the biodiversity value of the ~~wildlife-rich scrub in site and especially the western part of the site which is ecologically linked with the adjacent land to the west.~~”

This provides site-specific focus for the application of Local Plan Policy NH/4: Biodiversity. With hindsight reference to this policy should have been made in paragraph 5.111 Links to local policy.

7) It has never been an intention of the Policy HIM08 to create a green space on the Jam Factory site that has open public access (Hain Daniels Group letter of 1 December 2019 refers).

8) We suggest a minor recasting of Policy HIM08’s third bullet point would improve clarity by removing the term “allow”: ***“Include ‘greenways’ open to ~~allow~~ members of the public to walk through from Chivers Way to the Community Orchard on Manor Park Field and to the High Street.”***

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This note makes reference to the following:

- Histon and Impington Neighbourhood Plan 2019 – 2031, Version 3 Submission version
- Histon and Impington Neighbourhood Plan 2019 – 2031, Version 2 ('regulation 14' consultation version)
- Statement of Common Ground between Histon & Impington Parish Council and South Cambridgeshire District Council October 2019
- The Planning Bureau Letter of 21 October 2019
- The Planning Bureau Letter of 26 October 2019
- Ecology and Protected Species Survey; Land off Home Close, Histon, Cambridgeshire, September 2019
- Planning Permission S/1938/96F and S/0478/02F
- Hain Daniels Group letter of 1 December 2019
- Histon & Impington Parish Council's response to the Examiner of 5 November 2019