

Dear Consultee

Re: Histon and Impington Neighbourhood Plan Pre-Submission Regulation 14 Consultation

We are writing to you to tell you about our Neighbourhood Plan which will be out for formal consultation with community and other important stakeholders during the period Monday 1st October to Friday 16th November 2018. This consultation is undertaken in accordance with Regulation 14 of the Neighbourhood Planning Regulations and is referred to as the Pre-Submission Regulation 14 consultation.

You are regarded as an important stakeholder in the plan because a building which you own or live in has been identified as an Interesting Building. Policy HIM02 Interesting Buildings identifies our interesting buildings as non-designated heritage assets and the policy requires that when any planning application is determined which may impact on the building, the importance of preserving the historic importance of the building or its setting will be considered.

Further information on Non-designated Heritage Assets

- There will be presumption to preserve the particular significance of the non-designated heritage asset, but this will be balanced against other material considerations
- A non-designated heritage asset does not have the same status as a 'listed' building and a listed building consent will not be required for future works
- Your permitted development rights are not affected
- Any planning applications for works to a non-designated heritage asset will be expected to show how the historic or local importance of the building has been taken into consideration in the design process.

Further information on the neighbourhood plan can be found at www.hiplan.net

A paper copy of the plan can be viewed at Histon Library and the Parish Office, Recreation Ground, New Road, Impington or at one of the advertised consultation sessions.

There is an online comment form available on the above site. Or if preferred, representations can either be emailed to Angela Young at clerk@hisimp.net

Or sent to:

Histon & Impington Parish Council
The Parish Office
Histon & Impington Recreation Ground
New Road
Impington
Cambridgeshire
CB24 9LU

Yours sincerely

Angela Young
Parish Clerk

1 It is clear from the SOCG that the District Council and Parish Council now agree that the criteria used in identifying and selecting the non designated heritage assets referred to in **Policy HIM02** have been derived from the advice in section 7 of *Local Heritage Listing: Historic England Advice Note 7*. I am grateful for this clarification. However, while the Consultation Statement indicates that face to face meetings were held with the owners of buildings affected by **Policy HIM02**, I am unclear as to whether the owners of all the identified buildings were consulted and whether they were made aware of the implications of the proposed designation? I would be grateful if the Parish Council could provide an answer to these questions.

Table 3.1 on page 14 of the Consultation Statement does indeed refer to 'Individual face to face meetings with those who may be impacted by the Interesting Buildings Policy.' However, this was an opportunity offered and specific meetings were not set up. Owners and occupiers of all the Interesting Buildings were written to explicitly as a part of the Regulation 14 consultation and subsequently two follow up meetings took place to respond to comments made during the consultation (see table 4.5 on page 25 of the Consultation Statement) and this letter made clear the implications of the proposed designation. A copy of this letter is attached.

2. I would be grateful if the District Council would confirm whether or not they are content that the structures identified in **Policy HIM02** (as proposed to be modified in the SOCG) as non designated assets are indeed worthy of this?

(South Cambs to answer this question)

3. In its response to my questions about **Policy HIM04** and Impington Mill, the Parish Council states that *"Priority is already given to the ability of the Mill to operate by existing national and local rules and regulation...."*. Similarly, it is stated that *"...existing national and local rules and regulations specifically address the protection of windmills so they can continue to operate with wind power"*. I would be grateful if the Parish Council would confirm which rules and regulations are being referred to?

The National Planning Policy Framework supports the conservation of Heritage Assets (paragraph 185, chapter 16). This is referenced in the Neighbourhood Plan document paragraph 5.43.

The Windmill is in an area designated in South Cambs' Local Plan as a Protected Village Amenity Area and policy NH/11 does not permit development within such areas which would adversely 'impact on the character, amenity, tranquillity or function of the village.' This is referenced in the Neighbourhood Plan document paragraph 5.41.

Furthermore South Cambs Listed Buildings Supplementary Planning Document (2009) (SPD) makes a presumption against development which would 'damage the context, attractiveness or viability of a Listed Building' (paragraph 4.41 second bullet point) and 'would harm the visual, character or morphological relationship between the building and its formal or natural landscape surroundings, or built surroundings' (third bullet point).

The SPD also refers to South Cambridgeshire's 'milling tradition' and it says that 'consent will not be given to any proposal which might compromise the future restoration of the mill. This would include works that could affect the power supply, diversion of water and any open land surrounding the

mill.’ (paragraph 15.20). This Supplementary Planning Document is available on line at <https://www.scams.gov.uk/media/6690/adopted-listed-buildings-spd.pdf>.

4 I note that in the SOCG **Map 12 HIM08** (which relates to the Jam Factory) has been modified to show the position of a ‘Community Orchard’ and ‘Green areas to be retained’. I would be grateful if the Parish Council would confirm whether this proposed modification been made in response to a consultation response on the Plan and, if so, which one? I ask this because I have not been able to locate any reasoning which deals directly with this proposed modification and would be grateful if I could be advised, in full, what that reasoning is including why it is necessary in order to meet the Basic Conditions. The Parish Council will of course be aware that a potential developer of this site has made representations objecting to this proposed modification and it may wish to respond to this.

The location of the Community Orchard has been added to the map because it is referenced in the policy (paragraph 5.105)

The policy includes the following statements regarding existing and aspirational green infrastructure:

‘a key consideration in any proposal is the biodiversity value of the wildlife-rich scrub in the western part of the site’

‘applicable opportunities will be sought to ... include ‘greenways’ open to the public’

‘a green separation between the employment site and Home Close shall be retained’.

Existing green areas were identified on the map in version 2.0 of the Neighbourhood Plan but along with other features on the base map were shown in grey in version 3.0. As a result, their relevance was lost. This has been corrected in the new Map 12 with the existing green areas being designated ‘green areas to be retained’

We accept that this wording goes beyond the intention of providing clarification and suggest that it is reworded to be ‘existing green areas’ and to allow the wording of the policy to guide their use in any future development.

We are aware of the representation by a potential developer and note that it makes comments about the value of the existing green areas which are inconsistent with the opinion expressed in the Neighbourhood Plan. This is highlighted in paragraph 5.105 (quoted below) which provides context for the policy, in the second paragraph of the policy itself, and in the text supporting the designation of Local Green Space V12 in table 6 HIM13 Schedule of Important Natural Habitats.

In addition, this green separation, being largely undisturbed, contributes to biodiversity locally and connects ecologically with adjacent land to the west, including the adjacent Community Orchard [identified as “F” in Map 12]

paragraph 5.105 provides context to policy HIM08

The biodiversity and connectivity sections of the dossier of evidence for site V12 are especially important. In synthesis, the dense scrub provides important nesting habitat and safe haven for many species, which forage in the fields and immature woodland of the adjacent Local Green Space (Manor Park Field/Histon Wood), as well as in nearby gardens.

As it is fenced off, the scrub has not been surveyed. However, species recorded in the adjacent LGS which, given their ecological requirements, very probably depend on the dense scrub in the Jam Factory site include: the Common Lizard, Bullfinch, House Sparrow, Reed bunting, Song Thrush, Yellowhammer, Mistle Thrush, Lesser Whitethroat, Chiffchaff and Willow Warbler. The first six of these are all listed as priorities for conservation under Cambridgeshire's Biodiversity Action Plan. These species would be negatively impacted - or eliminated altogether - if the scrub were removed or replaced. Thus, far from being of low ecological value, the scrub is a crucial part of the habitat mosaic.