

Haddenham and Aldreth Neighbourhood Plan Reg. 16 Publication: Representations Received

ECDC published the draft Haddenham and Aldreth Neighbourhood Plan for the period 14 April to 31 May 2022. The table sets out all comments received during the publication period. Comments are arranged alphabetically by name of organisation, or by surname where submitted by an individual.

Name	Date received	Comments
<p>AAH Planning Consultants</p> <p>Helen Wilkinson on behalf of Land Allocation Ltd</p>	<p>31 May 2022</p>	<p>Dear Strategic Planning Team</p> <p>Re: Regulation 15 consultation on Haddenham and Aldreth Neighbourhood Plan</p> <p>I refer to the above document and the consultation upon its contents. Please accept this letter as our response to the Regulation 15 consultation. This representation has been prepared by AAH Planning Consultants on behalf of Land Allocation Ltd, who have an interest in the land south of Wilburton Road, Haddenham.</p> <p>In accordance with (Regulation 15 Town and Country Planning, England, Neighbourhood Planning (General) Regulations 2012), notification of consultation on the Haddenham and Aldreth Neighbourhood Plan (Submission Draft Plan April 2022) (HANDP) has been given following the submission of the HANDP to East Cambridgeshire District Council on 13th April 2022. The consultation period runs for 7 weeks, from 14th April 2022 to 31st May 2022. This representation responds to this consultation and builds upon representations submitted on behalf of Land Allocation Ltd in response to the Regulation 14 consultation of the HANDP.</p> <p><u>Comments on the relevant policies of the Haddenham and Aldreth Neighbourhood Plan (Submission Draft Plan April 2022)</u></p> <p>Generally, with regard to Plan Making, including Neighbourhood Plans, the NPPF states that at Paragraph 18 ‘Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies, and/or in local plans that contain both strategic and non-strategic policies, and/or in local or Neighbourhood Plans that contain just non-strategic policies.’</p> <p>Paragraph 29 of the NPPF states that: ‘Neighbourhood Planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.’ Footnote 16 clarifies that ‘Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.’</p>

In addition, Paragraph 37 of the NPPF 2021 states, 'Neighbourhood plans must meet certain 'basic conditions' and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum.' Footnote 23 defines other legal requirements as those 'set out in Paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended)'.

Paragraph 8 Schedule 4B to the Town and Country Planning Act 1990 (as amended) subparagraph 2 provides for the Basic Conditions to which a Neighbourhood Plan are to be tested against, which can be summarised as:

- Is the Plan appropriate having 'regard to' national policies and advice contained in guidance issued by the Secretary of State?
- Does the Plan contribute to the achievement of sustainable development?
- Is the Plan in general conformity with the strategic policies contained in the development plan for the East Cambridgeshire District Council area?
- The Plan should not breach, and should otherwise be compatible with, EU Obligations.

The rest of this representation considers the aforementioned policies and whether they comply with the principles of sustainable development, are in line with the NPPF and whether the Neighbourhood Plan is considered to meet the basic conditions.

Policy HAD1 – Spatial Strategy

Looking first at Policy HAD1 – Spatial Strategy, it states:

“Development Envelopes for Aldreth, Haddenham Village and Hill Row are defined on the Policies Map. Sustainable development proposals within the Development Envelopes will be supported in principle, subject to being of an appropriate scale and not having an unacceptable impact on:

- i. the amenity of residents;
- ii. the historic and natural environment;
- iii. the provision of services and facilities; and
- iv. the highway network.

Land outside the Development Envelope is defined as countryside where development will normally only be allowed for agriculture, horticulture, forestry, outdoor recreation and other uses which can demonstrate a need to be located in the countryside.”

As detailed, this representation builds upon a previous representation submitted in response to the Regulation 14 consultation towards the end of 2021. As part of that representation, it was suggested that development limits are a dated concept, however if they are to be retained, it should be ensured that they are revised to deliver the future housing requirement and that “a more holistic approach should be taken to

determine whether development limits are too tightly drawn, which may restrict growth in the future and any such changes should be in line with any potential development envelope boundaries of the forthcoming Single Issue Local Plan Review.”

Paragraph 5.2 of the Haddenham and Aldreth Neighbourhood Plan (Submission Draft Plan April 2022) has not been amended, and we reiterate the comments made in the previous Regulation 14 representation. Restrictive development limits that have not been drawn holistically may lead to a restriction in housing growth.

We note the Parish Councils Haddenham and Aldreth Neighbourhood Plan Consultation Statement (April 2022), in which responses to representations to the Regulation 14 consultation have been provided at Appendix 6. We note that the Parish Council consider a more holistic approach “is not necessary and the approach incorporated in the Neighbourhood Plan is consistent with national and local policy”, however we maintain our concern that restrictive development limits may inhibit future growth. We are aware of the current Regulation 19 consultation in regards to the Single Issue Local Plan Review, on which we intend to also make representations. Basing the HANDP on the current Local Plan where Policy GROWTH 1 and the housing requirement are acknowledged as being out of date, risk the HANDP requiring review sooner than is usually required in order to ensure it is positively prepared and seeks a suitable level of housing growth. A neighbourhood plan cannot propose less growth than required by the Local Plan.

Our concerns over restrictive development envelopes was shared by the Inspector in Appeal Decision 3282449, allowed on 11th February 2022, who specifically stated: “This requirement cannot be relied upon and the amount of housing now needed in the district within this plan period to 2031 is uncertain, as is the question of whether the need can be accommodated within existing settlement envelopes and/or whether sufficient housing allocations exist.” (Paragraph 14)

We note the modification to Policy HAD1, which, in the pre-submission draft plan, previously stated:

“Proposals for development located outside the Settlement Boundary will only be permitted where they are in accordance with national and District Level policies” has been amended in the submission draft plan to:

“Land outside the Development Envelope is defined as countryside where development will normally only be allowed for agriculture, horticulture, forestry, outdoor recreation and other uses which can demonstrate a need to be located in the countryside.”

Despite this amendment, we maintain our concerns in the Regulation 14 representations that this policy still seeks to restrict development in the countryside for its own sake rather than taking a more holistic approach but note the inclusion of “where development will normally only” and “other uses which can demonstrate a need to be located in the countryside” which may allow for other forms of development than those listed, subject to justification.

We maintain that Policy GROWTH 2, which provides the locational strategy for delivering the expected growth in the district but strictly controls development in the countryside, is considered out of date, a view which has been recently supported through Appeal Decision 3282449, allowed on 11th February 2022 in which the Inspector states; “There was much debate during the Inquiry as to whether policies

GROWTH 2 and GROWTH 4 should also be considered out of date for the purposes of this appeal. Based on the evidence put to me there is little doubt in my mind that they should. Policy GROWTH 2 is a locational strategy predicated on delivering the housing requirement contained in out-of-date Policy GROWTH The Council’s planning witness accepted during cross examination that it would be wrong to assume what the locational strategy should be without knowing the new housing requirement and I agree.” (Paragraph 14) It is therefore correct that the HANDP should not rely on Policy GROWTH 2 of the ECDC Local Plan 2015 for its locational strategy. We maintain that the HANDP is overly restrictive in its approach to settlement envelopes however recognise that some amendments to Policy HAD1 have been made, which may allow for certain forms of development in the countryside, although we consider that this could be expanded further whilst still protecting the countryside holistically.

Policy HAD2 – Housing

The second Policy which we intend to respond to is Policy HAD2 – Housing, which reads:

“This Plan provides for at least 161 additional dwellings to be developed in the Neighbourhood Plan area between 2019 and 2031. This growth will be met through:

- i. the implementation of planning permissions that had not been completed as at 1st April 2019 and new planning permissions granted between 1st April 2019 and 31st March 2021; and
- ii. small “windfall” sites and infill plots within the Development Envelopes identified on the Policies Map that come forward during the Plan period and are not specifically identified in the Plan.”

This policy text remains unchanged from the previous Regulation 14 consultation. The explanatory text from Paragraphs 6.1 and 6.2 outlines that the ECDC 2015 Local Plan identified two sites within Haddenham for new housing development, and including the two sites, it is anticipated that at least 103 new dwellings would be built in Haddenham Village between 2013 and 2031. It is also stated that the figure of 161 additional dwellings is equal to the number of dwellings with planning permission which hadn’t been completed as of 1st April 2019, and that the figure is supported by the Local Plan Single Issue Local Plan Review, which concludes that there is no need to identify additional sites for housing across East Cambridgeshire.

Our previous Regulation 14 representation highlighted that, importantly, ECDC acknowledge that Policy GROWTH 1 of the ECDC 2015 Local Plan is out of date, and therefore the housing requirement detailed within the policy is also out of date, hence the continued work on the Single Issue Local Plan Review which we note is currently out for Regulation 19 consultation. Paragraph 6.2 of the HANDP Submission Draft Plan states that “the District Council has set a housing requirement for the Neighbourhood Plan based on the current strategy and requirements in the adopted Local Plan.” With this in mind, it is our opinion that the housing requirement figure be reassessed, given the acknowledgement that the currently adopted Local Plan figure is out of date.

Whilst the Single Issue Local Plan Review states that there is no need to identify additional sites for housing across East Cambridgeshire, we refer to our previous Regulation 14 representation which stated:

“It was noted that the housing need figure suggested in the Single Issue Local Plan review did not provide an uplift for economic growth and should also take into consideration the impact of the coronavirus pandemic on the house building industry. Furthermore, a buffer of 20% should be applied to the housing need figure in order to ensure the housing requirement is future-proofed with enough flexibility, choice and competition provided for in the housing market, reflecting government guidance.”

Whilst we have not yet considered the latest Regulation 19 consultation document for the Single Issue Local Plan Review, we maintain our stance that the housing need figure is likely to be subject to change and that any housing figure derived from utilising the standard method should be seen as a minimum.

We also wish to re-emphasise that a neighbourhood plan utilising a lower housing figure with a lack of allocations does not support the government’s objective of “significantly boosting the supply of homes” as outlined in Paragraph 60 of the NPPF 2021. We acknowledge the Parish Council’s response to this concern in the Consultation Statement, that there is no evidence “to suggest that there is a significant additional requirement for housing in Haddenham during the neighbourhood plan period.”

However, we refer back to the aforementioned Appeal Decision 3282449, in which the Inspector considers that the amount of housing required across the District up to 2031 is now uncertain and can no longer be said that sufficient housing can and will be accommodated within the defined settlement envelopes (Paragraph 17).

Furthermore, the lack of a local housing needs survey informing the neighbourhood plan may contribute to the plan not being positively prepared. Whilst we recognise the Parish Council’s response and that “there is no requirement to undertake a specific local needs housing survey as part of the Neighbourhood Plan preparation,” a survey undertaken by our client has observed a need for further market and affordable housing in Haddenham. We reaffirm our concern that this has not informed the construction of the neighbourhood plan.

We also note that the Parish Council have stated in their response to our Regulation 14 representation in the Consultation Statement (April 2022) that “There is no need to allocate additional sites for housing in Haddenham and, even if there were, there is no assessment of reasonable alternative sites that might provide a more sustainable solution for the village.” We maintain that additional allocations are likely required, a view supported by Appeal Decision 3282449 and suggest that such an assessment is undertaken.

Policy HAD3 – Housing Mix

Moving on to Policy HAD3 – Housing Mix, which states:

“Housing development must contribute to meeting the existing and future identified needs of the Neighbourhood Plan Area. Proposals that deliver homes with three bedrooms will be supported.”

The previous Regulation 14 representation highlighted concerns that Policy HAD3 is overly restrictive when considering the acute need for affordable housing within Haddenham and the higher proportion of five or more bedrooms homes. The Parish Council’s response to this clarified that the policy “does not state that proposals that deliver smaller [than three bedrooms] homes would not be supported.” However, we feel it is important to emphasise the value of specific wording within the policy and suggest that Policy HAD3 could be reworded to be supportive of proposals delivering homes with three bedrooms or less, reflecting the Parish Council’s response. The housing needs survey which our client

has previously undertaken has demonstrated an acute and urgent need for affordable housing within the parish. Furthermore, Policy HAD3 continues to make no specific reference to the affordable housing provision which is to be provided as part of the New Road allocation.

Additionally, we maintain that consideration should be given to proposals which will deliver homes that meet the Lifetime Homes Standard requirements, as detailed in Policy HOU1 of the ECDC Local Plan 2015. We understand that there are still no permitted sites in the pipeline in Haddenham which meet this threshold (50 dwellings or more), which could result in a lack of inclusive and accessible homes.

Policy HAD8 – Protection of Important Views

Next, onto Policy HAD 8, which states:

“Important views from public vantage points either within the built-up area or into or out of the surrounding countryside are identified on the Policies Map. Any proposed development should not detract from the key landscape and built development features of those views as identified in the Neighbourhood Plan Design Codes document.

Proposals for new buildings outside the Development Envelopes will be required to be accompanied by a Landscape Visual Impact Appraisal or other appropriate and proportionate evidence that demonstrates how the proposal can be accommodated in the countryside without having a detrimental impact, by reason of the buildings scale, materials and location, on the character and appearance of the countryside and its distinction from the built-up area.”

In our previous Regulation 14 representation, we recognised the inclusion of additional important views identified in the HANDP (one of which encompasses our client’s site), separate from those identified in the Haddenham Design Code, though afforded the same protections through Policy HAD 8. However, we questioned the justification of the inclusion of these views, given that the Haddenham Design Code was authored independently but did not identify the views in question (circled in red in the image overleaf). We note that additional viewpoints, circled in purple overleaf, have been included in the HANDP Submission Draft Plan.

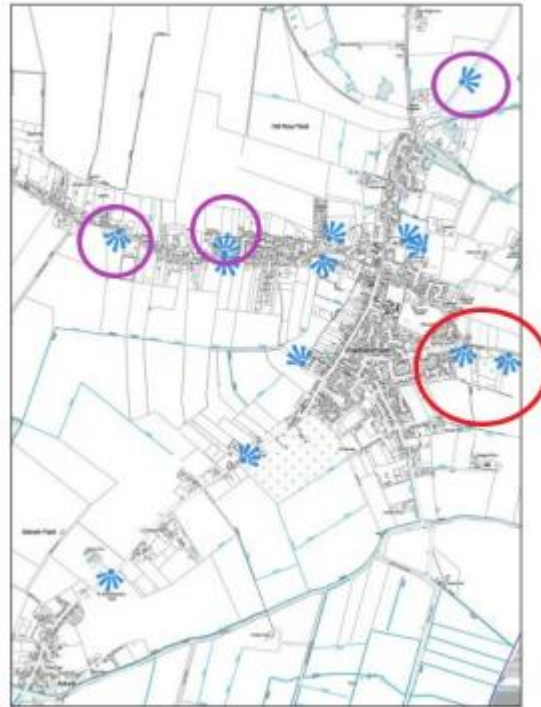


Figure 1: Additional views identified from Regulation 14 consultation (red) and from Regulation 15 consultation (purple)

The Parish Council’s response informed us that “A separate Assessment of Important Views will be published to demonstrate the importance of these views”. However, the wording of Policy HAD8 only refers to “... those views as identified in the Neighbourhood Plan Design Codes document” whereas it has already been established that these additional views do not form part of the Design Code document. Justification for the inclusion of these viewpoints should be incorporated as part of this consultation either as part of the Neighbourhood Plan itself or as part of the background documents; the justification for the inclusion of viewpoints should not be considered retrospectively, and we maintain that robust evidence should be produced to justify why these views are important.

Policy HAD 9 – Settlement Gaps

The final policy which we wish to respond to is Policy HAD 9, which reads:

“To conserve the essential landscape, heritage and rural character of the Neighbourhood Plan Area, development proposals shall, where appropriate, demonstrate how they would not result in the erosion of the settlement gaps identified on the Policies Map.”

In our previous Regulation 14 representation, we questioned the necessity of introducing the concept of settlement gaps, considering the lack of robust evidence and clear justification (including their notable absence from the independent Design Code) for the need for settlement gaps and the lack of either current or proposed strategic supporting policies; we reiterate our concern over the lack of evidence and justification once again. Paragraph 8.7 makes the case that the identification of settlement gaps is necessary in order to “protect the distinctiveness of the settlements and groups of housing within the settlements.” We note the Parish Council’s response to our Regulation 14 representations considers that “the avoidance of coalescence between settlements is an established town planning approach” and that “the District council has not objected to this policy.”

In regards to our client’s site, our previous Regulation 14 representation detailed how the site falls within a proposed settlement gap, however the site is bordered by built development on three sides and is located in close proximity to urbanising features such as the notable water tower. Additionally, there is existing development to the east of the site, located between the site and Wilburton, meaning that the development of our client’s site will not contribute to the erosion of a perceived gap between Haddenham and Wilburton. With a lack of any additional evidence or justification for the need of settlement gaps, we maintain our concern over their incorporation into the HANDP.

Other Comments

We note there has been an increase in the number of references and emphasis on the importance of traditional orchards in the neighbourhood plan area, which we welcome considering their decline in recent years. We highlight that the proposed development on our clients site incorporates a community orchard for the use of both existing and new residents and consider that inclusion of such elements could be encouraged in other developments.

Conclusion

We maintain that we do not consider the HANDP meets the Basic Conditions and conflicts with national and local policy. It presents an overly restrictive approach to development management through tightly drawn development limits which would not contribute to the achievement of sustainable development which has recently been questioned in an Appeal Decision, following a Public Inquiry. Moreover, the plan continues to lack suitable site allocations, relying instead on existing permissions being built out. However, ECDC acknowledge Policy GROWTH 1 of the ECDC Local Plan 2015 is out of date and currently the housing requirement figure is uncertain. Therefore, the HANDP could be targeting a housing requirement that could be lower than what will form the Local Plan, requiring its review sooner than is usually necessary and the plan not being positively prepared. This would exacerbate an already acute shortfall of housing, especially affordable housing (which our client has demonstrated through their own housing needs research). Additionally, the lack of a holistic approach to development envelopes could worsen the situation. We also maintain our concerns over the inclusion of additional views as part of Policy HAD 8 which currently have no justification; the justification for these views should not be considered retrospectively and should be provided as part of this consultation to allow comment.

		<p>In the context of the above commentary, we do not consider that Haddenham and Aldreth Neighbourhood Plan meets the basic conditions, and we, therefore, urge further consideration of the compliance with the NPPF and, therefore, the basic conditions test of the Neighbourhood Plan take place.</p> <p>If you require any further information or wish to discuss the matter further, then please do not hesitate to contact me at this office</p>
<p>Cambridge-shire County Council</p> <p>Colum Fitzsimmons, Development and Policy Manager</p>	<p>25 May 2022</p>	<p>Good morning</p> <p>Thank you for providing Cambridgeshire County Council with the opportunity to comment on the draft Haddenham and Aldreth Neighbourhood Plan. The following comments have been made:</p> <p><u>Waste Management Team</u></p> <p>Appendix 2 Development Management Checklist - It is acknowledged that consideration is given for on-plot of waste collection bin storage between collections. However, it would also be helpful to include consideration of how waste collection vehicles can access properties and where waste material can be presented for collection without obstructing public footways and carriageways.</p> <p><u>Transport Strategy</u></p> <p>The County Council welcomes the Neighbourhood Plan’s objective to support and encourage safe and sustainable transport, including walking cycling and public transport. This is consistent with the County Councils policies and strategies.</p> <p>We disagree with point 11.5 page 41 which states that any significant improvements hinge on a plan to declassify the A1123/A1421 roads to B Class. The County Council’s Highways and Transport Committee made a decision on this matter at their meeting on the 27 July 2021 (see link below). https://cambridgeshire.cmis.uk.com/ccc_live/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/1709/Committee/62/Default.aspx</p> <p>The committee reports highlight why the technical evidence demonstrates that the reclassification of the A1123/A1421 would have little impact on the volume of traffic including HGVs using these roads. It should be noted that the committee resolved to: “request officers investigate potential options for traffic calming and speed reduction measures on these roads and possible sources of funding.”</p> <p><u>Local Lead Flood Authority</u></p> <ul style="list-style-type: none"> • The Neighbourhood Plan includes details on Flooding and Sustainable Drainage, as well as Policy HAD15, which covers this topic. This is really encouraging to see and the LLFA supports this policy and part of the plan. • There should be more emphasis on attenuation of water within the proposed Policy HAD15, discharging water at the natural greenfield runoff rates where possible, to ensure that the surface water flood risk is mitigated in the downstream network.

		<ul style="list-style-type: none"> • All water that leaves the site must be clean and suitably treated in line with the best practice guidance before discharge from the site. • Reference should be made to the Cambridgeshire Flood and Water Supplementary Planning Document (SPD), or any subsequent version, which is adopted by East Cambridgeshire. Chapter 6 of this document sets out the principles of surface water management in development that developers should follow when designing their scheme. <p>I hope that these comments will be of help to the Parish Council and should you have any further issues realtong to this please do not hesitate to contact me.</p>
<p>East Cambridgeshire District Council</p> <p>Edward Dade, Strategic Planning Officer</p>	<p>31 May 2022</p>	<p>RE: Haddenham and Aldreth Neighbourhood Plan Submission Draft Plan (April 2022)</p> <p>This letter sets out East Cambridgeshire District Council’s (ECDC) response to the Draft Haddenham and Aldreth Neighbourhood Plan (HANP) which was submitted to ECDC in April 2022.</p> <p>Having carefully reviewed the Draft HANP, ECDC consider it capable of satisfying the basic conditions and other relevant legal obligations, and consequently makes only very limited comments in this representation.</p> <p>Policy HAD1 - Spatial Strategy</p> <p>The policy sets revised Development Envelopes for Haddenham village, Aldreth and Hill Row. As explained in the supporting text, since the Local Plan was adopted a number of additional developments have been granted planning permission and, in some instances, developed on sites which are not within the Local Plan 2015’s Development Envelope. Assuming the plan is made, these revised Development Envelopes will take precedence over the current Development Envelope in decision-making (as set by the Local Plan 2015, GROWTH 2). ECDC raises no concerns with the proposed revised Development Envelopes.</p> <p>The East Cambridgeshire Local Plan 2015’s locational strategy concentrates the significant majority of development in the market towns of Ely, Soham and Littleport, with relatively modest growth in villages and as rural windfall in locations such as Haddenham and Aldreth. The policy offers in principle support to sustainable development proposals within the Development Envelope. ECDC considers this approach to be consistent with the Local Plan’s locational strategy.</p> <p>ECDC is currently undertaking a single-issue review (SSR) of the Local Plan 2015. The SSR seeks to update the Local Plan’s housing requirement. The SSR does not seek to change how growth is distributed nor does it seek to make additional site allocations, since the housing requirement can be met through existing committed sites and allocations. Consequently, the SSR is not likely to affect the operation of the HANP’s proposed policies.</p> <p>Other Policies in the Draft HANP</p> <p>ECDC has no representations to make in respect of any of the other policies in the Draft HANP.</p>

		<p>Strategic Environmental Assessment (SEA) ECDC is the “responsible authority” for the purpose of SEA. ECDC subject the HANP to a SEA screening exercise during the plan’s preparation, which involved consultation with statutory bodies.</p> <p>ECDC has issued a Determination Statement which confirms it is satisfied that implementation of the HANP is not likely to give rise to significant effects on the environment</p> <p>Conclusion In conclusion, ECDC considers that the Haddenham and Aldreth Neighbourhood Plan appears capable of satisfying the basic conditions and other relevant legal obligations.</p>
<p>Freckenham Parish Council</p> <p>Jadi Coe, Clerk</p>	<p>11 May 2022</p>	<p>Freckenham Parish Council have no comment on the plan at this time.</p>
<p>Historic England</p> <p>Edward James, Historic Places Advisor</p>	<p>31 May 2022</p>	<p>Ref: Haddenham and Aldreth Neighbourhood Plan Regulation 16 Consultation</p> <p>Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.</p> <p>Having reviewed the plan and relevant documentation, we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</p> <p>We would be grateful if you would notify us on eastplanningpolicy@historicengland.org.uk mailto:eastplanningpolicy@historicengland.org.uk if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.</p> <p>Please do contact me, either via email or the number above, if you have any queries.</p>

<p>Isleham Parish Council</p> <p>Richard Liddington, Clerk</p>	<p>16 May 2022</p>	<p>We acknowledge notification of the above consultation. We appreciate the amount of work that will have gone into this document, have no concerns regarding its contents and want to wish you every success in having it progressed</p>
<p>Marine Management Organisation</p> <p>David Spray, Marine Planner (East)</p>	<p>09 May 2022</p>	<p>Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.</p> <p>Kind regards, The Marine Management Organisation</p> <p><u>Marine Management Organisation Functions</u></p> <p>The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.</p> <p><u>Marine Planning and Local Plan development</u></p> <p>Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the Coastal Concordat. This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.</p> <p>Under Section 58(3) of Marine and Coastal Access Act (MCAA) 2009 all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) <u>must have regard to</u> the relevant marine plan and the UK Marine Policy Statement. This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service: soundness self-assessment checklist. We have also produced a guidance note aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our gov.uk page.</p>

See [this map on our website to locate](#) the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our [Explore Marine Plans](#) online digital service.

The adoption of the [North East](#), [North West](#), [South East](#), and [South West Marine Plans](#) in 2021 follows the adoption of the [East Marine Plans](#) in 2014 and the [South Marine Plans](#) in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.

Marine Licensing and consultation requests below MHWS

Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a [marine licence](#) in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our [marine licensing guide for local planning authorities](#) for more detailed information. We have produced a [guidance note](#) (worked example) on the decision-making process under S58(1) of MCAA, which decision-makers may find useful. The licensing team can be contacted at: marine.consents@marinemanagement.org.uk.

Consultation requests for development above MHWS

If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:

The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a 'development plan' under the [Planning and Compulsory Purchase Act 2004](#). Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response.

It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act.

If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application.

Minerals and Waste Local Plans and Local Aggregate Assessments

If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:

		<p>The Marine Policy Statement (MPS), Section 3.5 which highlights the importance of marine aggregates and its supply to England’s (and the UK’s) construction industry.</p> <p>The National Planning Policy Framework (NPPF), which sets out policies for national (England) construction mineral supply.</p> <p>The minerals planning practice guidance which includes specific references to the role of marine aggregates in the wider portfolio of supply.</p> <p>The national and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period, including marine supply.</p> <p>The minerals planning practice guidance requires local mineral planning authorities to prepare Local Aggregate Assessments. These assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine sources. This means that even land-locked counties may have to consider the role that marine-sourced supplies (delivered by rail or river) have – particularly where land-based resources are becoming increasingly constrained.</p> <p>If you wish to contact the MMO regarding our response, please email us at consultations@marinemanagement.org.uk or telephone us on 0208 0265 325.</p>
<p>Natural England</p> <p>Corben Hastings, Support Adviser</p>	<p>18 May 2022</p>	<p>Publication of Draft Haddenham and Aldreth Neighbourhood Plan</p> <p>Thank you for your consultation, which was received by Natural England on 14 April 2022</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.</p> <p>[Annex available on request]</p>