

10 Appendix 3 – Modification Statement for Pre-submission Consultation (Reg.14)

This statement is prepared in accordance with the Neighbourhood Planning (General) Regulations 2012.

Statement

We, the qualifying body for the Houghton on the Hill Neighbourhood Development Plan, consider that the Submission Version of the plan and the accompanying documents are a significant modification of the existing Neighbourhood Plan for the following reasons:

- *They now include one site allocation for housing plus a reserve site. The original plan contained only a reserve site.*
- *They include several other new policies which were absent from the original Plan.*
- *There are substantial changes to some of the existing policies.*

As a result, we anticipate that the Plan will require to go through Examination and Referendum stages before adoption.

*Houghton on the Hill Parish Council,
Qualifying Body for the Houghton Neighbourhood Development Plan, May 2025*

228. The NDP(2018) was produced at a time when three significant planning applications had already been approved which in total provided for the majority of dwellings required under the Local Plan. This consequently limited the scope of NDP(2018) but the situation is now quite different. Following the 2021 “Call for Sites”, many were offered and reported in the HDC SHELAA. Some applications for new residential housing development in Houghton area have been submitted but none approved as at the date of this document.

229. Because the situations are quite different many fundamental changes have been made in the drafting of an updated NDP, specifically in respect of:

- a. seeking to provide an area of separation between adjacent villages;
- b. allocation of a development site, having an appropriate mix of housing to satisfy a new requirement for the designated area;
- c. greater emphasis on addressing the impacts of climate change;
- d. improving biodiversity,
- e. providing greater emphasis on protecting and enhancing walking and cycling provision within the village and footpath connections to the countryside.

230. Independent specialists have provided an objective assessment of potential development sites and an in-depth review of housing needs for the DA. These inputs have been valuable when drafting the updated plan as have new consultations with residents, businesses and landowners.
231. The Village Design Statement (VDS) previously contained within NDP(2018) is now replaced by a more comprehensive companion document “Village Design Guide and Codes” (VDG&C) to be read in conjunction with, and forming part of, the NDP.
232. The following compares policies in NDP(2018) with those in this revised NDP. Policies discarded, are indicated as “Discarded”, any retained unchanged as “Retain Unch”, those retained but changed as “Retain & Change”, and new policies as “New”. Many policies are new while some have been retained but altered to better reflect the current situations. Explanatory notes are included. The Policies are addressed in the sequence shown in the NDP(2018). A different sequence is used in the revised NDP.

Section D Design of Sites and Buildings		(Objectives 1 & 2)
Policies in NDP(2018)	Action Re Policy	Policies in the revised NDP
POLICY D1: SUSTAINING THE CHARACTER OF THE CONSERVATION AREA	Discarded	Replaced by a new policy D1 DESIGN (see below) with reference to the VDG&C.
POLICY D2: SUSTAINING THE CHARACTER OF HOUGHTON OUTSIDE THE CONSERVATION AREA	Discarded	Replaced by a new policy D1 DESIGN (see below) with reference to the VDG&C.
POLICY D3: SUSTAINING THE RURAL CHARACTER OF HOUGHTON THROUGH THE USE OF GREEN SPACES	Discarded	Replaced by new Policy L6 IMPORTANT OPEN SPACES INCLUDING THOSE FOR SPORT AND RECREATION.
DESIGN: The Village Design Statement (VDS) at para. 1.5 and para. 1.6 included some general design guidance but no specific policy was presented, as details for sites were already agreed by HDC.	NEW	POLICY D1: DESIGN AND POLICY D2: HOUSING DESIGN Requires designers and developers to consider design guidance contained in the VDG&C which seeks to identify and protect the distinctive elements which together make up the special qualities of the landscape setting and the built heritage of the DA.
Extensions and alterations were mentioned in the VDS but not as a Plan Policy	NEW	POLICY D3: EXTENSIONS & MODIFICATIONS TO EXISTING DWELLINGS WITHIN THE SETTLEMENT BOUNDARY Provides a focussed reference when read in conjunction with the VDG&C such as for planning applications.
Energy Efficiency and Climate Change were mentioned in the VDS, but not as a Plan Policy.	NEW	POLICY D4: ENERGY EFFICIENCY AND MITIGATING THE ADVERSE EFFECTS OF CLIMATE CHANGE Provides new, and greater, emphasis on a range of important topics.

Section H Housing Provision (Objective 3)		
Policies in NDP(2018)	Action Re Policy	Policies in the Revised NDP
POLICY H1: GENERAL HOUSING PROVISION	Retain & Change	Now included in site allocation policy L3A. See Section L “Use of Land” below.
POLICY H2: SPECIALIST HOUSING FOR PEOPLE IN LATER LIFE	Retain & Change	Now included in site allocation policy L3A. See Section L “Use of Land” below.
Housing mix was removed from the draft of NDP(2018) following advice, because housing requirements were already covered by consented planning applications.	NEW	POLICY H1: HOUSING MIX To address the current over-provision of large dwellings, and better meet the needs identified by independent housing needs assessment and the Community Questionnaire.
Affordable housing had already been determined by HDC as part of consented applications prior to the writing of the NDP.	NEW	POLICY H2: AFFORDABLE HOUSING Sets guidelines to complement the criteria set out by the LPA.
Traffic and Transport were mentioned at para. 4.4 but no specific policy was included.	NEW	POLICY H3: PARKING & TRAFFIC MANAGEMENT IN NEW DEVELOPMENTS Housing developments completed in recent years included insufficient parking provision particularly for visitors. Together with narrow carriageways this leads to a greater incidence of on-pavement parking, and seriously restricted carriageway width.

Section L Use of Land (Objective 4)		
Policies in NDP(2018)	Action Re Policy	Policies in the Revised NDP
The Settlement Boundary (SB) in the made plan was pre-determined by already approved applications. The Reserve Site was included (wrongly it transpires) within the boundary line.	NEW	POLICY L1: SETTLEMENT BOUNDARY With the need to provide for more residential housing development, an allocated but as yet undeveloped site is specified in the NDP, hence the boundary had to be redrawn to include it.
Areas of Separation (AoS) were not considered when drawing up NDP(2018).	NEW	POLICY L2: AREA OF SEPARATION A large number of SHELAA sites were offered west of Houghton village and east of the adjacent villages of Bushby & Thurnby and Scraftoft. This policy seeks to reduce the risk of these villages becoming joined and seeks to retain the geographical distinction and visual separation of the built areas.
No site allocations were made as consents had already been granted.	NEW	POLICY L3A is a Site Allocation. POLICY L3B provides for a Reserve Site.
No infill policy as consents to satisfy most of the HDC requirements had already been granted.	NEW	POLICY L4: INFILL HOUSING Provides basis for infill development to support site allocation L3A in satisfying the emerging HDC Local Plan.
Policy D2 refers to VDS guidance on developments within agricultural areas, but there is no specific policy.	NEW	POLICY L5: DEVELOPMENT WITHIN AGRICULTURAL AREAS Provides basis to re-purpose agricultural buildings for non-residential purposes
POLICY D3: SUSTAINING THE RURAL CHARACTER OF HOUGHTON THROUGH THE USE OF GREEN SPACES	Existing discarded & replaced by NEW	POLICY L6: IMPORTANT OPEN SPACES INCLUDING THOSE FOR SPORT AND RECREATION This revised policy seeks to protect important open space, and sport & recreation sites.

Section S Services & Facilities (Objective 5)		
Policies in NDP(2018)	Action Re Policy	Policies in the Revised NDP
POLICY S1: RETENTION AND ENHANCEMENT OF KEY SERVICES AND FACILITIES	Retain & Change	POLICY S1: RETENTION OF KEY FACILITIES POLICY S2: RETAIL Includes additional criteria that should be considered in decision making.
POLICY S2: INFRASTRUCTURE	Retain & Change	POLICY S3: INFRASTRUCTURE A broader and more detailed policy including reference to developer contributions to support community infrastructure.
POLICY S3: PROVISION OF HIGH-SPEED BROADBAND	Discarded	Full fibre-to-the -premises (FTTP) broadband now available throughout most of the DA so a separate policy is not now required. Reference to technology (including broadband) is included in Policy S3.

Section EV Environment (Objectives 6, 7 & 8)		
Policies in NDP(2018)	Action Re Policy	Policies in the Revised NDP
POLICY E1: CONSERVATION OF HABITATS AND BIODIVERSITY	Retain & Change	POLICY EV1: CONSERVATION OF HABITATS AND BIODIVERSITY Provides more extensive measures for protection now developers are required to enhance biodiversity by at least 10%. New map shows biodiversity corridors needing to be protected.
Trees, hedges and wildflowers were not specified within Policy E1 above	NEW	POLICY EV2: TREES, HEDGES AND WILDFLOWERS Provides guidance with regard to protection of existing, and provision of additional, hedgerows, trees etc. in new developments.
HERITAGE ASSETS were not addressed.	NEW	POLICY EV3: HERITAGE ASSETS This policy seeks to protect such assets when developments are being considered.
Footpaths were referenced in Appendix 4 Para. 1.1.5 "Community Projects to be Considered" but not included as a Policy.	NEW	POLICY EV4: FOOTPATHS, BRIDLEWAYS, CYCLEWAYS AND ACCESS TO THE COUNTRYSIDE Policy to ensure proper consideration is given to these important topics when new developments are being considered.
Water management was referenced in the VDS but not included as a Policy.	NEW	POLICY EV5: WATER MANAGEMENT AND WATER-COURSES Measures are set out to better protect and enhance the management of water in new developments.

Section EM Employment		(Objective 9)
Policies in NDP(2018)	Action Re Policy	Policies in the Revised NDP
Little stakeholder support was evidenced so no policy provided.	NEW	POLICY EM1: EMPLOYMENT AND COMMERCIAL DEVELOPMENT Seeks to protect existing employment and provide guidance for any new proposals.
Working from home was not prevalent at the time. The impact of COVID-19, coupled with improvements in technology, have since encouraged significant increase in working from home, hence need for a policy.	NEW	POLICY EM2: WORKING FROM HOME Supports planning applications that enable home working but in a controlled way.
Farm diversification did not have a high profile in 2018 but has become more prevalent as an economic benefit/necessity in the countryside, hence the inclusion of a policy.	NEW	POLICY L5: DEVELOPMENT WITHIN AGRICULTURAL AREAS Acknowledges that diversification can often provide the gateway to financial viability for a farming enterprise and provide new employment opportunities for the local community.