

West Wickham Parish Council Response to Neighbourhood Plan Independent Examiners Questions Dated 4 April 2022

The following responses to the Annex in letter 01/AF/WWNP were approved by West Wickham Parish Council on 11 May 2022.

1. Paragraph 6.8 of the Basic Conditions Statement confirms that the Plan has been prepared having regard to the fundamental rights and freedom guaranteed under the European Convention on Human Rights. Is the Parish Council satisfied that the Plan does not breach Human Rights (within the meaning of the Human Rights Act 1998)?

Yes, the Parish Council are satisfied that the Plan does not breach Human Rights (within the meaning of the Human Rights Act 1998).

2. Policy WWK/2 – on-plot parking in line with Local Plan Policy: Is the appropriate policy Local Plan Policy T1(sic)/3 (as per Policy WWK/11)?

Yes, T1/3 is the current appropriate Local Plan Policy for WWK/2 although the Parish Council note that it is likely to be superseded by Policy I/EV in the emerging Greater Cambridge Local Plan. The advocated direction for Policy I/EV in the Greater Cambridge Local Plan First Proposals consultation is for a more design-led approach rather than the prescribed minimum provisions in T1/3. The Parish Council believe that both policies are appropriate and recognise the high car ownership, lack of local services and public transport in West Wickham.

3. Policy WWK/7 – net gain in biodiversity: Would reference to the District Council's Supplementary Planning Document (SPD) be appropriate?

Yes, the Greater Cambridge Biodiversity Supplementary Planning Document (adopted 7 February 2022) was adopted after our submission draft was finalised but is now an important reference for Policy WWK/7 being applicable to both the current and emerging Local Plans.

4. Policy WWK/8 – retention and enhancement from development proposals: Is the policy intended to apply to all development proposals?

In part, the policy intent is that all development proposals, including extensions, should retain the existing network of public rights of way, footpaths and bridleways and not adversely impact public enjoyment of them. We agree with the comment 23/#59424 from South Cambridgeshire District Council that it would be appropriate to state that only the development of new dwellings that have the opportunity to link or enhance existing rights of way will be expected to do so.

5. Policy WWK/9 – delivery of smaller homes over larger homes: Please clarify what would constitute a smaller home/larger home.

The Parish Council consider, for the purposes of Policy WWK/9 a smaller home will have two or fewer bedrooms.

With respect to SCDC response 24/#59425 we note a factual inaccuracy in our submission plan paragraph 4.93 in that it states “there are currently no one-bedroom properties in the parish”. This is incorrect and we propose to remove this sentence in its entirety.

6. Policy WWK/10: The use of the terms “affordable homes” and “smaller homes” (in the plural) suggests that a minimum provision of two such homes would be required. Is this correct?

Yes, Policy WWK/10 is intended to apply to schemes coming forward under exceptional circumstances in Local Plan Policy S/11 (sub-section 3) of more than 2 and up to 8 dwellings and thus the plural terms are appropriate. It is not intended that Policy WWK/10 would apply to schemes of not more than 2 dwellings coming forward under section 2 of Local Plan Policy S/11.

7. Policy WWK/11 – expansion/enhancement on or adjacent to the Village Hall: Should Policy Map 6 also be referenced in this policy?

The highlighted red area defines the area we consider ‘on or adjacent to the existing Village Hall’. We would be happy to include a reference to Policy Map 6 as well as Policy Map 11 in the policy wording.

We also note SCDC response 26/#59426 and agree that section (a) in Policy WWK/11 does not apply due to the highlighted red area not including the recreation space. Thus, policy wording discussing its retention is redundant and could be removed. Removing bullet (a) would also remove ambiguity regarding the meaning of ‘enhanced’ referenced in SCDC response 27/#59426.

8. Glossary – “Affordable Housing”: Is there any particular reason why a definition different from that set out in the NPPF has been used?

No, we retained the abbreviated definition from the 2012 NPPF due to this section being written before the publication of the 2019 NPPF. We are happy to reference or include the 2019 NPPF if deemed appropriate or required.

9. Representations regarding land at White Gables, 104 High Street: Please comment on the appropriateness of including the site within the Neighbourhood Plan/Development Framework.

Given the limited scope for development in the Parish our Neighbourhood Plan does not seek to allocate sites and seeks instead to improve our housing mix with policies that work with suitable sites as defined by the existing and future Local Plans. The Parish Council feel that this approach was fundamental to our plan and it was repeatedly consulted on throughout our plan development. The Parish Council feel that to add

policies to revise the settlement boundary for planning purposes or allocate a particular site would be inappropriate at this late stage.

Contrary to the assertion in the submission by Richard Markland Architects Limited that “South Cambridge Local Plan views it the role of Neighbourhood Plans to suggest suitable sites” the LPA have not expressed any concerns that our Neighbourhood Plan does not allocate sites, or that it is a failure to meet the Basic Conditions to not allocate sites. The Parish Council disagree that it is “important that the Parish identifies suitable sites for new homes” to redress the imbalance in housing stock because the Local Plan already has appropriate policies in place that identify suitable sites. The Neighbourhood Plan policies that mandate smaller dwellings are intended to work with these Local Plan policies.

The Parish Council acknowledge that the current development frameworks for West Wickham do have some minor anomalies but felt it was undesirable to attempt to redraw the boundaries and effectively reproduce a revised Local Plan Policy S/7 as part of our Neighbourhood Plan:

1. During the formation of our plan we wished to accommodate the development of the new Greater Cambridge Local Plan. The proposed Policy S/SB Settlement Boundaries seeks to “take into account the present extent of the built-up area” in formulating “settlement boundaries around settlements, identifying areas that are considered to be part of the settlement for planning purposes”. The Parish Council had considerable concerns that any attempt to supplant an existing Local Plan policy, potentially with inconsistent boundaries with a future Local Plan policy would justifiably not be supported by the LPA on the grounds of duplication of a current Local Plan policy and causing ambiguity regarding the status of future sites.
2. Each potential change to the boundary to include or exclude a particular area would have to be technically and objectively assessed. No precise criteria have been published by the LPA to inform this process.
3. Given (2) the assessment of any boundary change would be subjective and thus the Neighbourhood Plan Working Group was concerned this was likely to cause considerable unease among landowners and neighbours, potentially violating their Terms of Reference from the Parish Council which demanded that any plan produced “should be capable of passing a local referendum”.
4. Community consultation responses consistently supported the current development framework boundary.

Specifically, regarding the submission by Mr Coulson regarding land at White Gables, 104 High St:

1. Mr & Mrs Coulson were consulted in plan development both as landowners in the Parish and as owners of the registered historic village green. They did not propose this site for allocation or a development framework boundary change at this stage.
2. Mr & Mrs Coulson did not propose this change at the pre-submission Regulation 14 consultation stage and were supportive of the draft plan in their response.
3. This site was not submitted to the LPA as part of their ‘Call for Sites’ as part of their First Conversations consultation on the new Local Plan.
4. Irrespective of the merits, demerits or deliverability of the proposed site, the Parish Council do not feel it would be appropriate to propose new policies or alter

existing ones to fundamentally change the status of one particular site after the various community consultations have concluded.

5. The Parish Council suggest that it would be appropriate for Mr & Mrs Coulson to make representations to the LPA as part of their consultation on the new Local Plan S/SB policy.
6. The Parish Council feel that this site's current status is unchanged by our Neighbourhood Plan, is in broad conformity with the Local Plan and thus is not a failure to meet the Basic Conditions.