

Stapleford and Great Shelford Parish Councils' response to Examiner's questions

Examiner questions issued 5 March 2025

Examiner question: *Policy S&GS1*

I note the details in the supporting text. Given that the Plan does not allocate sites for housing development, should I assume that the policy applies only to infill/windfall sites?

Response from Parish Councils: The policy is intended to apply to all proposals that come forward for planning permission in the Plan area during the Plan period, whether infill, windfall or other sites that have the potential to come forward in or on the edges of the villages. The Plan cannot allocate development sites because it is surrounded by greenbelt and has a dearth of brownfield sites. Planning monitoring data provided by the local planning authority records that during the period 2017 to March 2023, 87 dwellings had been completed in the Plan area with a further 51 in the development pipeline; this excludes 147 dwellings currently under construction as part of Strawberry Fields retirement village, located outside the development framework and in the greenbelt in Stapleford Parish (permitted on appeal in 2021).

It is important that new residential development, including development that could result in settlement expansion of the two villages, contributes a housing mix that is appropriate to addressing needs arising from Plan-level dwelling stock/householder characteristics, etc, and takes into account up to date information such as that set out in the Stapleford and Great Shelford Housing Needs Assessment 2024.

It is also highlighted here that Clauses 1 and 2 allow for flexibility to accommodate a range of circumstances that could arise during the Plan period. The opening clause refers to the housing mix providing "*a starting point for the determination of an appropriate housing mix*" and Clause 2 states that schemes which propose an alternative housing mix must be "*justified with reference to up to date evidence of existing and future needs in the Plan area or to local site-specific circumstances*". Should strategic scale development come forward, for example at a future date during the Plan period (and under an updated Local Plan) but, say, on the edge of Cambridge (or other location that bears no relationship with the villages), then the policy includes the appropriate wording to accommodate that scenario.

Examiner question: *Policy S&GS2*

As with Policy 1, I note the approach taken. However, is the ambition of the policy a process issue rather than a land use matter?

Response from Parish Councils: Policy S&GS 2 will only apply to sites that come forward in locations outside the development framework as defined in South Cambridgeshire's 2018 Local Plan.

In the case of neighbourhood plan policies within South Cambridgeshire District, there is a link between what is stated in a development plan and how the housing allocation process

works. An existing example is Policy WAT 23 'Allocation of affordable housing at Waterbeach New Town' in the currently adopted Waterbeach Neighbourhood Plan.

The two Parish Councils have worked alongside housing officers and policy planners at South Cambridgeshire District Council in agreeing this policy. It will ensure that any growth that occurs outside the current settlement boundaries (on sites large enough to trigger the S106 affordable housing requirement) will go some way towards addressing the ever-growing Plan-level affordable housing need. This is good place making.

Placing the local connection requirement outside the body of the planning policy would run the risk of failing to achieve the policy aims. This is because the local authority housing allocation process and practices can be subject to change and review, and initial policy intents or ambitions that are not stated within the body of a planning policy as part of the statutory development can become forgotten as time passes and staff change.

We have referred, above, to the example of an adopted neighbourhood plan in South Cambridgeshire district. Other examples are:

- Policy 2D 'Affordable Housing' in the Saham Toney Neighbourhood Plan (adopted by Breckland District Council in November 2021)
- Policy HP6 'Provide affordable housing' in the Petersfield Neighbourhood Plan (modified plan adopted by South Downs in 2024).

Examiner question: *Policy S&GS4*

**Is there any need for the word 'only' in the policy given the range of criteria in the policy?
Do the parish councils anticipate that development proposals should meet all the criteria?**

Response from Parish Councils: Yes. The word 'only' ensures that the policy intention is accurately reflected in the policy text. The word was inserted following Regulation 14 consultation where the local planning authority response, alongside two responses from residents, revealed that the policy was at risk of being interpreted as if the Plan proactively encouraged the provision of additional specialist housing for the elderly. Given the ongoing influx of housing of this type in the Plan area, this is not the case.

The previously worded policy did not include the word 'only'. The local planning authority responded at the Regulation 14 stage, expressing concern that "the villages could become saturated with this type of housing, especially as there is a need for younger generation".

Yes. Development proposals should meet all the criteria.

By way of context, Strawberry Fields retirement village (147 units) consented on the edge of Stapleford village, together with a 39-unit retirement home (Pearce Lodge), opening imminently, and a 63-person capacity care home (Barley Manor) which opened in August 2024, both in Great Shelford, more than adequately address Plan-level need (as projected in the Housing Needs Assessment 2023 up to 2043) for market care home beds – indeed, together they contribute significantly to need in the wider area.

The existing supply of specialist housing in the Plan area comprises:

Facility	Tenure/type	No of units
The Chestnuts/Cox's Close, Stapleford	Social rent Retirement bungalows with management staff and alarm services	30
Acacia Court/Chaston Road/Grain Close, Great Shelford	Social rent and shared ownership Flats and bungalows with management staff and alarm services	47
Kingsdale Court, Great Shelford	Market Accessible bungalows and houses 55+	27
Mill View, Great Shelford	Social rent and shared ownership Flats 55+	70
Old School Court, Great Shelford	Flats and houses 55+	25
Barley Manor, Great Shelford	Market care home providing nursing and dementia care Retirement rooms with management staff	63
Cambridgeshire Care Home, Cambridge Road, Great Shelford	Care home with nursing	72
Under construction...		
Pearce Lodge	Market retirement flats with 24hr support system	39
Rangeford retirement village	Market homes	147

Examiner question: Policy S&GS5

In general terms, this is a good policy and will support the development of homes which are suitable for multi-generational living

Could the need for any such developments to be located within the development framework (currently in criterion g) be incorporated within the opening element of the policy?

I am minded to recommend that parts 2-4 of the policy are relocated into the supporting text. Do the parish councils have any comments on this proposition?

Response from Parish Councils: Yes, criterion g) could be incorporated within the opening element of the policy if needed.

With regard to the second question, considerable discussion has taken place between the two Parish Councils and the local planning authority in finalising the submission wording. Due to the potential for unintended consequences (such as overdevelopment) and the potential for different interpretations to arise as to how the policy should be implemented, it is considered that the three clauses should remain in the policy. This would provide the most clarity for all involved.

We suggest that the second question should also be directed to officers at the local planning authority since they will be applying the policy in practice. Furthermore, they provided comments and requests for amendments during both informal and formal (Regulation 14) consultation stages prior to submission of the Plan.

Examiner question: Policy S&GS6

The policy addresses design in a very positive way. In addition, the approach taken is underpinned by the excellent Design Guidance and Codes.

Given that the Plan does not allocate sites for housing development should I assume that the policy applies only to infill/windfall sites?

I am minded to recommend that the third part of the policy is relocated into the supporting text. Do the parish councils have any comments on this proposition?

Response from Parish Councils: The policy is intended to apply to all development proposals that come forward in the Plan area, other than to proposals specifically associated with the City of Cambridge.

The policy is seeking to ensure that proposals which come forward in Stapleford and Great Shelford take their design cues from the Stapleford and Great Shelford vernacular, rather than from the more urban context of nearby Cambridge.

The policy recognises that it would not be appropriate for development on the edge of Cambridge, but sitting within the Plan area, to fall under the remit of this policy. That is why the land area covered by adopted Local Plan Policy E/2 'Cambridge Biomedical Campus Extension' is excluded on Map 3.

With respect to Clause 1i), we note an objection from Nightingale (see their paragraph 6). We wish to propose a change which would address their concern as follows:

Rural Hinterland design principles: where otherwise acceptable, proposals coming forward in the Rural Hinterland Character Area (see Map 3) should comply with the design principles set out in RH.11 in the S&GS DG&C 2023. This clause would not apply to any edge of settlement proposals such as those that become allocated through the emerging Local Plan or future rural exception sites. Such schemes would need to be informed by the characteristics in the neighbouring character area.

With regard to Clause 3, we have no comment on this.

Examiner question: Policy S&GS7

In general, the policy takes a positive approach towards mitigating and adapting to climate change through building design.

However, is the approach taken in the second and third parts of the policy either reasonable or appropriate?

Response from Parish Councils: Yes. The policy requires development to be designed in such a way that it is compatible with a net zero emissions future and is an appropriate policy response to Objective 3. The design expectations set out in Clause 2a) and 2b) reflect what is

considered to be best practice in this field. A particular requirement is the submission of a Sustainability Statement which is intended to demonstrate how specific aspects of sustainable construction would be achieved. A clause appears underneath Clause 2 clarifying that the level of detail required in the Sustainability Statement will be proportionate to the scale and nature of the proposed development – this is then supported by further detail in the supporting text.

It should also be noted that the policy contains no absolute requirements, thereby being appropriate having regard to up to date national guidance, namely the December 2023 'Local Energy Efficiency Standards Update'.

Clause 3 sets out design expectations to ensure that new development is designed to adapt to the effects of climate change. These design expectations are not onerous and are all common sense measures.

Policy S&GS 7 is intended to work alongside other planning policies at the Local Plan level and at the national level. The policy, together with the supporting text, is more specific than the Local Plan with respect to what information should be included in the Sustainability Statement; it provides a more up to date context and reflects best practice.

The policy is particularly appropriate having regard to paragraph 158 of the NPPF (Dec 2023) and paragraph 162 of the NPPF 2024:

"Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures. Policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure."

Examiner question: Policy S&GS8

In general, the policy takes a positive approach towards renewable energy schemes.

However, does the policy bring any parish-level value beyond that which exists in relevant national and local planning policies?

Response from Parish Councils: Clause 2 Policy CC/2 in South Cambridgeshire's 2018 Local Plan rules out any wind turbine proposal unless the development site is in an area identified via a neighbourhood plan as suitable for wind energy development. The supporting text to Policy S&GS 8 refers to a single community wind turbine which could, in principle, be supported under this Local Plan policy. The intention of Policy S&GS 8 is to allow such a proposal to come forward, if the area has first been identified as being suitable for wind energy. This is in line with footnote 58 in the NPPF 2023. The inclusion of the policy does not in any way indicate that the S&GS Plan area has already been identified as being suitable for wind energy. Without Policy S&GS 8, any wind turbine proposals (even a small scale community wind turbine) would be ruled out through Policy CC/2 of the Local Plan.

Examiner question: Policy S&GS12

I looked carefully at the landscape character of the neighbourhood areas, and the relationship between the various settlement (and between those settlements and Cambridge) during the visit.

Do parts 1b and 2 of the policy address strategic matters rather than parish-based issues?

Response from Parish Councils: As articulated in the first line of the S&GS Vision Statement, residents attach a great deal of importance to Stapleford and Great Shelford remaining distinct from Cambridge. To support the vision, the Plan's 5th objective reads:

"New development will activity minimise its impact on the landscape character of the Plan area, recognising the value of long views and vistas into and out of the rural setting of the villages, the open spaces within it and, critically the separation of the villages from the expanding urbanised Greater Cambridge area."

Retaining separation between the two villages and the City of Cambridge is a key priority for residents in the Plan area. As part of engagement work undertaken in 2023, 89% of people responding either strongly agreed or agreed with this objective. Clause 1b) therefore reflects an aspiration shared by the community.

The development pressure in and around the City of Cambridge is meanwhile undoubtedly evident. South Cambridgeshire's 2018 Local Plan allocates a parcel of land in the north of the Plan area to accommodate planned expansion of the Cambridge Biomedical Campus and it is expected that the emerging Greater Cambridge Local Plan will also allocate land for development. In this respect, Clause 1b) is included in recognition of this development pressure and the possibility of increased development at both the Cambridge fringe and at the village edges. Rather than negating the value of retaining an area of separation, it in fact provides a key part of the rationale for it.

Whilst Clause 1b) is included with the intention of seeking to address a Plan-level and community-shared priority, it is nonetheless also acknowledged that it is the role of the emerging Greater Cambridge Local Plan to determine how strategic development needs will be addressed. SCDC officers will be able to confirm but, so far, Local Plan consultations undertaken under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 have indicated the following spatial strategy for Greater Cambridge:

- North East Cambridge is identified as the most sustainable location for strategic scale development, contingent upon a Development Consent Order being secured for the relocation of a Waste Water Treatment Plant
- Cambridge Airport
- Cambridge Biomedical Campus, comprising:
 - bringing forward the allocations already established in the 2018 Local Plan (affects land in the S&GS NP area, i.e. Local Plan policy E/2 'Cambridge Biomedical Campus Extension')
 - a proposal for potential additional land to the south (outside the NP area) where it may be possible to demonstrate a case for exceptional circumstances

to release land from the greenbelt. The First Proposals work includes a draft allocation for land adjoining Babraham Road as a potential area to be released from greenbelt specifically to meet the long-term needs of the Campus. This area of land adjoins the S&GS NP area but falls completely outside it

- draft policy 17 'Cambridge Biomedical Campus (including Addenbrooke's Hospital) Area of Major Change', covering the allocations above plus land to the south which is included in the Plan area but which is proposed for an 'area of green infrastructure and biodiversity improvements to the south west of any future expansion area's built development boundary'.

www.consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/First%20Proposals%20-%20FINAL%20FURTHER%20REVISED%2028.10.21-red.pdf

Another draft proposal set out in the Regulation 18 Local Plan was for the allocation of land between Hinton Way and Mingle Lane for 100 homes – this land falls within the Plan area. Work has started on preparing a planning application for this site.

In conclusion, whilst Clause 1 b) is written from the perspective of addressing a Plan-level priority, it is also recognised that it is not within the scope of a neighbourhood plan to direct how strategic development needs will be addressed.

To address this conflict with the role of strategic planning, Clause 1b) could be reworded to read:

b) ~~retain the existing area of separation between Stapleford and Great Shelford and the City of Cambridge~~ respect the identity of Stapleford and Great Shelford as two villages distinct and separate from the City of Cambridge and avoid them coalescing with the City.

Clause 2 reflects the community-wide recognition of development pressure in and around Cambridge and seeks to address potential negative impacts on the two villages by establishing clear expectations with respect to landscape mitigation measures.

Examiner question: Policy S&GS13

It would be helpful if the parish councils expanded on the way in which it assessed the identified views beyond the information set out on paragraph 8.17 of the Plan.

Several representation comments about the general nature of the views identified. Again, it would be helpful if the parish councils expanded on the way in which they selected the views

Response from Parish Councils: The views work undertaken for the S&GS NP is very comprehensive. Views identified as locally important in the 2019 LCA work provided the starting basis for the work. They were reappraised by the NP steering group in 2022 and an expanded set of 26 views subsequently featured in our Mid-Tern Community Consultation (2023) (see Appendices 6 and 7 to the Consultation Statement). All 26 views were considered by respondents to be either 'very important' or 'important' to the Plan area. A small number

of other locally important views were identified in consultation feedback and taken forward for further consideration and consultation.

The pre-submission (Regulation 14) NP presented 29 views for consultation. By Regulation 16 consultation, one of these views had been dropped and another added (the latter being view 'O', the high part of the countryside park between Hinton Way and Haverhill Road – this was a late inclusion, reflecting the newness of the countryside park).

The 29 views in the submission NP have both landscape and visual value. Appendix 7 provides comprehensive descriptions for each view and explains the important features within each of the views.

Notwithstanding the above, and in light of representations made with respect to a number of the views, we wish to propose amendments to remove views which, whilst still valued by the local community, are less significant in landscape and visual terms than others. To identify these views in as systematic a manner as possible, we have scored and subsequently ranked all views against each of seven criteria.

Criteria for assessing landscape value:

- a. there is a clearly defined feature within the view cone (e.g. a particular hill, other important landscape feature or settlement)
- b. the view gives clear context to the wider setting of the Plan area
- c. permanent loss of the view would represent a fundamental change to the landscape
- d. rarity of the view type within Stapleford and Great Shelford.

Criteria for defining visual value:

- e. appreciation of the view is the principal activity of being at the viewpoint (rather than, say, the view being incidental/unimportant to the experience, or being experienced only transiently while passing through the landscape)
- f. the positive contribution the view makes towards creating or enhancing a sense of place (equally, loss of the view would reduce or remove a sense of place)
- g. the view is part of an Important Countryside Frontage.

One further criterion was applied: where the majority of a view's features lie outside the Plan area, this was considered sufficient reason to remove the view entirely from the NP.

The detail and outcomes of our assessment of views are fully explained in the accompanying document, 'S&GS NP views assessment'. However, to summarise:

- 10 views are considered 'highly important' and 9 views 'important' to the Plan area and should be retained in Policy S&GS 13
- 9 views are considered 'lower priority' and we propose to remove them from Policy S&GS 13
- we propose to remove 1 further view because most of its features lie outside the Plan area.

To address concerns raised with respect to the views, we also propose an amendment to the wording of the first clause of the policy as follows:

Development proposals **must respect, and where possible enhance,** ~~must maintain or enhance~~ the key features and the setting of the **locally important** views into and out of the settlement area, listed below, described in Appendix 7 and shown on Map 7. Development proposals which have an impact on views must be supported by a Landscape and Visual Impact Assessment or a Landscape and Visual Appraisal.

Examiner question: Policy S&GS14

The District Council does not consider that any of the three proposed Important Countryside Frontages meet the criteria for designation and should be deleted from the Plan. It would be helpful if the parish councils comment about the way in which they consider that the proposed Frontages meet the criteria set out in the adopted Local Plan.

Response from Parish Councils: With respect to ICF A 'Stapleford – a broad expanse of arable land penetrating the built-up area between no. 41 Gog Magog way and properties at Chalk Hill', the Parish Councils do not accept the comment from SCDC. Furthermore, at a meeting on 19/2/25 between members of the S&GS steering group and planning officers at the local planning authority, SCDC withdrew its objection to ICF A. The argument for retaining ICF A presented at the meeting by the Parish Councils is as follows:

Policy NH/13 in South Cambridgeshire's 2018 Local Plan states that ICF's are defined where land with a strong countryside character either:

- penetrates or sweeps into the built-up area, providing a significant connection to the rural area **or**
- provides an important break between two nearby detached parts of the development framework.

As is asserted in paragraph 8.25 a) in the submission plan, ICF A is found to meet the first of these criteria. As is also stated in paragraph 8.25 a), this gap is located at a key arrival point to the village when both approaching and departing the village via Gog Magog Way, further increasing the local significance of the gap. The gap lies between two areas of built up development. The gap is bounded by the 'development framework' to the west and by 18 homes at Chalk Hill to the east. A further 147 homes are shortly coming to market as part of Strawberry Fields retirement village immediately to the east of the Chalk Hill properties.

With respect to ICF C 'frontage east of Haverhill Road', the Parish Councils do not accept the comments from SCDC. As is asserted in paragraph 8.25 c) in the submission plan, ICF C is found to meet the first of the criteria for ICF designation. Upon arriving or departing Stapleford village along Haverhill Road, the traveller experiences a swathe of countryside sweeping into the village along this frontage. This countryside gap is experienced from the road as well as from within Stapleford Recreation Ground, further increasing the significance of this ICF. In follow-up discussions on 19/2/25, SCDC expressed a concern about how ICF C was bounded. We can clarify that it extends from the NE-facing boundary of 88 Haverhill Rd to the start of mature hedgerow alongside Haverhill Rd 160m to the NE.

We suggest amending paragraph 8.25c) so it reads:

“Stapleford – frontage east of Haverhill Road, extending approximately 160m from a point immediately adjacent to the edge of the built-up area to the start of mature hedgerow lining the roadside. Upon arriving or departing Stapleford village along Haverhill Road, the traveller experiences a swathe of countryside sweeping into the village along this frontage. There is a locally valued view (View V along Haverhill Road) reflecting the significance of this aspect. As described in Appendix 6, this view is ‘scanning ENE to SSE, taking in Little Trees Hill at Magog Down, open arable land and a copse on the sky line.’ The key contributing features to a sense of place are...”

With respect to ICF B ‘Stapleford – arable land sweeping into the built-up area in the gap between numbers 27 and 31 Mingle Lane’, we propose to address SCDC’s concern by removing this ICF from the Plan.

Examiner question: Policy S&GS15

The policy on local green spaces (LGSs) takes the matter-of-fact approach in the NPPF and is underpinned by the details in the supporting text and in the LGS Assessment.

There is an opportunity later in this Note to comment on representations which relate to specific proposed LGSs.

Should the second part of the policy (on a Protected Village Amenity Area) be a separate policy rather than a sub-component of a local green spaces policy?

Response from Parish Councils: The Parish Councils have no comment to make in response to this. Either approach would work.

Examiner question: Policy S&GS17

In general, the policy takes a positive approach towards delivering community infrastructure priorities alongside new development.

However, does the policy bring any parish-level value beyond that which exists in relevant national and local planning policies?

Response from Parish Councils: Policy S&GS 17 ‘Delivering community infrastructure priorities alongside new development’ identifies existing and anticipated infrastructure needs within the Plan area. Clarifying Plan area-specific priorities adds value to this existing context. It will be useful for applicants and local planning authority development management officers in their interpretation of Local Plan policies (SC/4 ‘Meeting Community Needs’, SC/6 ‘Indoor Community Facilities’, SC/7 ‘Outdoor Play Space, Informal Space and New Developments’ and TI/8 ‘Infrastructure and New Development’).

Growth has been taking place within the Plan area and it will continue to take place. The policy is appropriate having regard to the NPPF, including paragraph 11 a) which states that “all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.”

Examiner question: Policy S&GS21

How have the parish councils considered the overlap between the submitted policy and Policy CSF/5 of the adopted Cambridge Southern Fringe AAP (which designates land for a countryside enhancement strategy).

Does the first part of the policy require that developers proactively look to take opportunities to implement the countryside enhancement measures described in the supporting text of the policy?

If so, how would the District Council determine the extent to which those opportunities had been pursued? Should the policy acknowledge that a developer will usually be able to secure countryside enhancement measures only within the application site?

Response from Parish Councils: Chapter 3 in the submitted S&GS NP provides an overview of the existing planning policy context and includes, as part of this, a map showing existing policy constraints specific to the Plan area. This includes the Southern Fringe landscape improvement area as it is applicable to the S&GS Plan area.

Paragraphs 11.25 to 11.27 in the submitted Plan describe the relationship between the Southern Fringe Area Action Plan and the submitted Plan. The Countryside Enhancement Strategy that is required as part of Policy CSF/5 has not been progressed since the adoption of the Area Action Plan in 2008. This is despite the continued expansion of Cambridge. That is why the S&GS LCA 2019 prepared on the behalf of the two Parish Council sought to identify opportunities within the Plan area for progressing the principles set out in Policy CSF/5 in the adopted AAP. Whilst the Countryside Enhancement Strategy committed to in the Southern Fringe Area Action Plan has not been progressed, we are aware of one example of a landscape improvement measure having taken place. This is the enhancement of a tree belt to the northeast of Nine Wells as part of the outline planning permission for Phase 1 of the Cambridge Biomedical Campus (CBC).

We are also aware that an underpinning very special circumstance cited by the PINS inspector¹ when approving the Rangeford retirement village (Strawberry Fields) in the greenbelt was the Countryside Park being proposed by the appellants. The appeals inspector considered this in the context that, in the 14 years since its adoption, not much of Policy CSF/5 had been achieved and that there was no programme in place for its implementation.

The rationale for preparing the Countryside Enhancement Strategy as far as is relevant to the S&GS Plan area is set out in paragraph 11.28 of the submitted Plan. It should also be noted that the S&GS Plan period runs to 2041, and it is not known whether the Southern Fringe Area Action Plan will be brought forward as part of the emerging Greater Cambridge Local Plan (it would seem unlikely). It is therefore very appropriate that the S&GS NP includes a Plan area-specific policy on this.

Following the end of the Regulation 16 consultation, this policy was further discussed at a meeting on 19/2/25 between members of the S&GS steering group and planning officers at

¹ As inferred from paragraphs 48 and 70 of the Appeal Decision APP/W0530/W/21/3280395

the local planning authority. Officers at the local planning authority were in agreement with the value and purpose of retaining the policy.

The identified improvements in Stapleford and Great Shelford's Improved Landscape Area are listed in paragraph 11.32. It should be noted that that this work has been directly informed by land-owner engagement undertaken as part of preparing the Plan.

The Parish Councils have engaged as follows with applicable landowners:

- Item 3 'Tree planting along southwest side of Haverhill Road' – the County Council as the owner of highways land has been engaged on this
- Item 4 'New Hedgerows and hedgerow trees corridor' – the land identified is on the boundary of land owned by St Johns College. Savills engaged on behalf of the College and supportive in principle of this. See also that Savills have again responded at the Regulation 16 consultation stage
- Item 6 'The Clay Pit' – this is owned by Great Shelford Parish Council
- Item 7 'Hobson's Brook' – the aspirations sought here are consistent with Policy CSF/5 'Countryside Enhancement Strategy' in the Southern Fringe Area Action Plan ,which states that a strategy will be prepared that comprises the 'creation of a landscape corridor along Hobson's Brook'. As the strategy has not yet come forward since the adoption of the AAP, it is only logical that the S&GS NP identifies this as a priority as part of its Landscape Improvement Plan
- Item 8 'new public open space' – applicable landowners here are members of the Pemberton Family. As part of engagement undertaken pre-Regulation 14 consultation they responded via Bidwells to state that they recognise the potential for the land adjacent to Nine Wells for environmental enhancement and possible public access. The extent of this land was amended following engagement with a third landowner.

With regard to Item 5 'new linear woodland/shelter belt to the south of the biomedical campus', this is not shown on the map as it is now implemented. The item remained on the map in error. To address this, we would like the opportunity to remove Item 5 from paragraph 11.32.

Paragraph 11.31 in the submitted Plan acknowledges that the identified improvements in paragraph 11.32 could take place outside the planning process as well as within the planning process. Crucially, without this articulated as planning policy in the S&GS NP, there would be no policy tool for appropriate improvements and enhancements to take place via development proposals.

Regarding the question about acknowledging that an applicant will normally only be able to secure enhancements within an application site, this is not considered necessary given the explanation provided in paragraph 11.31. If such a clarification is needed, it should be placed within paragraph 11.31 so all the text regarding implementation appears in the same place.

Other representations

The Parish Councils are grateful for the opportunity to comment on a number of the other representations:

SCDC response (paragraph 7) relating to Policy S&GS 1

Parish Councils' response: For schemes of 5 units and more, Part 1 a) requires the remaining units (the remaining 50%) "to be a mixture of 1, 2 and 4 bedroom properties." This draws on the numbers set out in Table 5-13 in the submitted Plan. We agree clarity could be improved by amending the clause as follows:

NP amendment request/suggestion:

In terms of size:

- *at least 50% of new dwellings to be 3-bedroom units and remaining units to be a mixture of 1-, 2- and 4-bedroom units (the exact mix to be appropriate having regard to Table 5-13 in this Plan).*

SCDC response (paragraph 8) relating to Policy S&GS 1

Parish Councils' response: SCDC have commented that the wording in Part 1 of the policy is superfluous, but the policy is worded as such to remove any ambiguity over this matter.

SCDC response (paragraph 12) relating to Policy S&GS 2, Clause 1

Parish Councils' response: we raise no objection to the policy wording changes proposed by SCDC if the examiner considers them necessary for the Plan to meet the basic conditions, so long as:

- it is clear that the policy is not intended to capture affordable housing being brought forward as part of a rural exception site (since such housing should all be subject to a local connection criteria, as per Policy S&GS 3)
- the Development Framework being referenced is that defined in South Cambridgeshire's Local Plan 2018, and not as part of any emerging Local Plan.

SCDC response (paragraph 14) relating to Policy S&GS3

Parish Councils' response: SCDC have commented that the policy overlaps with Local Plan Policy H/11, especially Clause 1, and do not support the statement set out in paragraph 6.42 in the supporting text which states that "schemes would not be expected to exceed 25 units".

Firstly, our response is that the policy is included in light of the high affordable housing needs in the Plan area – Policy S&GS 3 is very important and is specific to the Plan area. Secondly, the policy is linked to supporting text which sets out local connection criteria that is deliberately different to that supporting Policy S&GS 2.

NP amendment request/suggestion:

With respect to the text set out in paragraph 6.42, this has been written to respond to a comment by SCDC made at Reg. 14 stage. To address this new concern at Reg. 16 stage, paragraph 6.42 could be amended as follows:

“6.42 Policy S&GS 3 is included in the S&GS NP to clarify support in principle for rural exception housing schemes in the Plan area, subject to the criteria set out in the policy. The policy refers to ‘small-scale’ affordable housing schemes. This is consistent with the NPPF 2023 which defines rural exception sites as “small sites used for affordable housing in perpetuity where sites would not normally be used for housing.” In practice (and consistent with Clause 1 b of Policy H/11 in South Cambridgeshire’s 2018 Local Plan) the size of a ~~small-scale~~ rural exception site will be informed by ~~the~~ size the size, facilities and character of the nearby village and of a scale appropriate to the site-specific context. Schemes can be as small as 5 to 10 dwellings but could be larger, particularly if located on the edge of Great Shelford.” ~~Schemes would not be expected to exceed 25 units.”~~

SCDC (paragraph 16) relating to part 1e in Policy S&GS 3

Parish Councils’ response: Our response to this is that providing and improving choices around active travel is a national priority and particularly relevant for the ‘necklace’ villages surrounding the expanding City of Cambridge, where places are subjected to a significant amount of congestion and traffic volumes arising from Cambridge-related through-traffic. Meanwhile, as is hopefully made evident in our NP, there are many initiatives in play to provide and improve choices around active travel links. The sustainability of the City of Cambridge and its hinterland villages are depending on this. Providing residents in a rural exception site with choice regarding active travel is just as important as for residents in a different development site. Requiring applicants of rural exception sites to utilise available opportunities within the scope of their site to provide/link up with active travel links is a reasonable requirement. The Clause 1e) allows the decision maker to prompt/require the applicant to do so if the applicant is not forthcoming in the initial instance.

SCDC (paragraph 17) relating to Part 1f) of Policy S&GS 4

Parish Councils’ response: SCDC have queried whether there is a size of development that Clause 1f) is aimed at and have suggested that it would be better if the sub-clause was a standalone clause. Our response is that the clause is clear that the requirement applies wherever a scheme deems it necessary and, yes, it would be better if it were a standalone clause.

NP amendment request/suggestion:

To respond to this comment, we suggest that Clause 1f) is made into a standalone clause which reads:

“Where necessary to meet the health care needs of the future occupants and where necessary to mitigate the additional demand placed on healthcare provision in the Plan area, and where directly, fairly and reasonably related in scale and kind to the development, financial contributions towards the provision of healthcare infrastructure in the Plan area will be sought.”

SCDC (paragraphs 21 and 22) relating to Policy S&GS 6

Parish Councils' response: SCDC have raised concerns regarding the length of the policy and the way in which it links with the Design Guidance and Codes. We wish to make the following points with respect to this:

- the purpose of the policy is to be clear about the design principles to be followed for development, reflecting what is important to the community
- the policy is informed by and draws upon work undertaken as part of the Design Guidance and Codes. It also draws on other applicable documents specific to S&GS, e.g. the Stapleford Conservation Area Character Appraisal, adopted by SCDC 2021
- the purpose is not to duplicate the Design Code
- post-Reg. 14, the NP steering group and Councillors did discuss options for reducing the length of the policy. The submitted version is the outcome of this discussion and reflects that Councillors find the current approach the most helpful (as opposed to putting less detail in the policy and relying on users to look up requirements in a separate document)
- parts 1 a) to i) include links to specific codes etc in order to assist the user of the policy, including the applicant, the development management officer or the Councillor seeking to assess a proposal against the policy and its supporting guidance document
- a long policy does not by definition mean it is difficult to follow
- the approach taken is intended to minimise ambiguity and ensure that good schemes are delivered
- the approach taken is not unusual. See also Pampisford referendum version NP (Policy PAM 6), and Buxton with Lamas NP (Policy BUX 4) post-examination Plan.

Nightingale (pg 6) in relation to Policy S&GS 6

Parish Councils' response: As noted in response to the examiner's questions, to address the point made by Nightingale with respect to Policy S&GS 6 clause 1i), we suggest the following amendment:

NP amendment request/suggestion

"Rural Hinterland design principles: where otherwise acceptable, proposals coming forward in the Rural Hinterland Character Area (see Map 3) should comply with the design principles set out in RH.11 in the S&GS DG&C 2023. This clause would not apply to any edge of settlement proposals such as those that become allocated through the emerging Local Plan or future rural exception sites. Such schemes would need to be informed by the characteristics in the neighbouring character area.

Resident comment in relation to Policy S&GS 9

Parish Councils' response: We agree with the error identified by the consultee where the information set out in paragraph 7.52, which is correct, is not accurately reflected in the policy wording. We would like the opportunity to correct this error as follows:

NP amendment request/suggestion

Amend the bulleted list in clause 1 of Policy S&GS 9 as follows:

Sites of Special Scientific Interest (SSSI)

- Gog Magog Golf Course
- Roman Road

Local Nature Reserves

- Beechwoods
- Nine Wells
- ~~Stapleford Pit~~

County Wildlife sites

- Wandlebury Country Park
- River Cam/Granta
- Magog Down
- Stapleford Pit

Hobson's Brook chalk river

Other sites of biodiversity value

- Clay Pit, off Granham's Road
- New countryside park (approved but not yet publicly open at the time of writing) between Hinton Way and Haverhill Road

Roebuck (pg 3) in relation to Policy S&GS 10

Parish Councils' response: We note the points raised by Roebuck on Policy S&GS 10 and do not agree that the policy does not meet the basic conditions.

With respect to Clause 4, the purpose of this clause to is flag up the opportunities that exist within the Plan area for enhancements to be delivered. By doing this the Neighbourhood Plan is providing location-specific information to help guide development. The clause is directly linked to Policy S&GS 9 and is particularly appropriate having regard to Paragraph 192 in the NPPF.

With respect to Clause 5, it is not correct that proposals that are exempt from BNG are not excluded from having to consider the incorporation of biodiversity measures into a development scheme. Regardless of BNG requirements, planning practice guidance makes it clear that "planning authorities need to consider the opportunities that individual development proposals may provide to conserve and enhance biodiversity and contribute to habitat connectivity in the wider area" (Paragraph 010 Reference ID: 8-010-20250219).

Swifts Local Networks in relation to S&GS 10

Parish Councils response: In response to the comment from this consultee we propose amendments to the supporting text and policy text for purpose of clarity:

NP amendment request/suggestion

Para 7.61: "Biodiversity enhancement opportunities exist for development proposals **otherwise including** those exempt from BNG. These include the installation of swift bricks (a universal nest brick

suitable for a wide range of small bird species), bat boxes, hedgehog highways, green roofs and walls. Clause 5 in Policy S&GS 10 requires such opportunities to be taken. Swift bricks should be installed in accordance with...”

2. Limb 5 of Policy S&GS 10: “...integrated bird boxes (such as swift bricks), bat boxes,...”

SCDC (paragraphs 27 and 28) in relation to S&GS 11

Parish Councils’ response: To address SCDC comments we suggest the applicable text in Clause 2 is amended as follows:

NP amendment request/suggestion

“All trees and hedgerows of good arboricultural value (category A or B in value using BS 5837) should be retained as an integral part of the design of any development, except where their long-term survival would be compromised by their age or physical condition or there are exceptional and overriding benefits in accepting their loss.

Where trees are to be replaced, replacement trees within the site will be required, taking into account the size, species and the condition of the lost items but at a minimum 2:1 ratio (meaning that for every tree lost at least 2 should be provided).

~~Replacement trees should be mature saplings (3–15 years).~~ Replacement trees should be planted at a suitable size to compensate for the removed trees.”

Roebuck (pg.4) in relation to Policy S&GS 11, Clause 3

Parish Councils’ response: With reference to Roebucks’ comment on Clause 3 in Policy S&GS 11 ‘Trees and Development’, we agree that the word ‘developers’ could helpfully be replaced by ‘applicants’.

NP amendment request/suggestion – as above.

Ely Diocesan Board of Finance in relation to reference to visually important land in Policy S&GS 12

Parish Councils’ response: The consultee has commented that it is not necessary for Stapleford Allotments to be designated as Visually Important Open Land when this land is already protected as greenbelt. The Parish Councils’ response is that there is no reason not to recognise the visual value of an area of land just because it falls within designated greenbelt. The NPPF specifies 5 possible functions that greenbelt land serves, and they do not cover landscape or visual quality. The policy appropriately responds to the findings in the LCA 2019.

Roebuck in relation to the definition of landscape character areas as shown on Map 5

Parish Councils’ response: With regard to the comment from Roebuck about Character Areas, we believe that we have addressed this concern through an amendment made to the Plan following the Regulation 14 consultation. Map 5 now divides this area into landscape character area B1, G1 and B1a, where B1/B1a is defined as ‘West Shelford arable lowland’.

As part of this, a 2024 addendum was also issued to the Landscape Character Assessment. Indeed, it was the sole reason for issuing the addendum.

Roebuck in relation to S&GS 12, Clause 2 footnote and Clause 4

Parish Councils' response: Roebuck have commented that the footnote is confusing and that they are unable to see any meaningful difference between Clause 4 and the first two limbs of this policy.

The footnote is included at Clause 2 to ensure that the NP does not conflict with national policy that would not allow a neighbourhood plan itself to direct growth to an area of land in the greenbelt.

NP amendment request/suggestion

With respect to Clause 4, there is an error as this should refer to the 'Improved Landscape Area' that is shown on Map 14 and in support of Policy S&GS 21 in the NP. We suggest that Clause 4 is amended as follows:

Proposals within or otherwise affecting the Stapleford and Great Shelford ~~Landscape Improvement Area~~ **Improved Landscape Area** should also comply with Policy S&GS 21 of this Plan.

SCDC (paragraph 30) in relation to Policy S&GS 13

Parish Councils' response: SCDC have indicated that views which are already part of the adopted Cambridge Local Plan 2018 do not need to be duplicated in the Plan. This is confusing since the Cambridge Local Plan does not apply to land within Stapleford and Great Shelford. Furthermore, just because a view is also a strategic view does not mean that it does not have value within the NP area. The NP is the most appropriate place to express views where they are important to landscape character at the neighbourhood plan level. For example, view Aa is similar to Strategic Viewpoint 7 in the Cambridge Local Plan 2018 but, in the Local Plan, the value of the viewpoint is in looking north along the southern gateway to Cambridge City; in our Neighbourhood Plan, a key attribute of view Aa from the same point is looking west towards the settled part of the Plan area. See also paragraph 8.18 which illustrates that the NP has not included a view on the basis of it having strategic importance.

Please also note the changes proposed to the views policy.

Carter Jonas on behalf of Axis in relation to S&GS 13 Views O, S, T and U

Parish Councils' response: The consultee objects to Views O, S, T and U. They have also included their own assessment of the views, prepared by the Landscape Partnership and referred to as the Rebuttal Statement. In the Rebuttal Statement it is asserted that:

- there is no clear methodology as to how the important views have been identified
- the proposed views do not take into account the changes to landscape and visual character that are taking place as a result of the Strawberry Fields retirement village development and associated countryside park which is currently under construction; or future potential changes to landscape and visual character likely to arise if either

the Cambridge CSET goes ahead or the draft allocation for residential development off Mingle Lane goes ahead.

The Parish Councils object to the assertion that there is no clear methodology as to how the views have been identified and this has been explained elsewhere in this document.

The Parish Councils' response is also that it is not correct to assert that the proposed important views do not take account of changes to landscape and visual character arising from the permitted retirement village and associated countryside park at land off Haverhill Road; they do, and this is evident when reviewing the detailed descriptions contained in Appendix 7.

With regard to changes to the landscape and visual character resulting from other potential development such as on land off Mingle Lane (a draft allocation in the emerging Greater Cambridge Local Plan) and CSET, if it goes ahead, these comments are a perfect illustration of the value of including Policy S&GS 13 in the Neighbourhood Plan. By identifying important landscape features and locally important views, the Neighbourhood Plan helps to facilitate a process by which potential visual and landscape impacts can be identified, evaluated and, as applicable, mitigated.

Indeed, with respect to the draft allocation of land off Mingle Lane, 'Nightingale Land' have submitted a response to the Regulation 16 consultation and provided, as part of this, a 'landscape briefing note' prepared by CSA Environmental. This contains a detailed assessment of the proposed impact of the development on Views O, S, T, U and Aa. The assessment concludes that *"appropriately designed and well landscaped residential development could come forward at the Site without compromising any of the identified Important Views."* See paragraph 4.2 in Appendix 1 to the Nightingale Land's response to the Regulation 16 consultation.

The Rebuttal Statement prepared by The Landscape Partnership includes a number of statements which the Parish Councils wish to challenge:

View 'O'

With respect to view 'O', in Table 3 (see page 6 of the Rebuttal Statement) "Independent Appraisal" the appraisal notes that this view currently has no public access, as we plainly set out in Appendix 7 to the S&GS NP. Of high relevance here is that this location will soon be in a publicly accessible location and, as noted by the appeals inspector (see below), it will provide a landmark view in a publicly accessible location.

The appraisal then goes on to assess view 'O' without having regard to the specific key features set out for view 'O' in Appendix 7 of the submission Plan. It refers, for instance, to the potential CSET route which would change the overall character of the area by bringing urbanising influences to the viewpoint, as well as to the draft allocation for residential development off Mingle Lane. If CSET goes ahead it will, once in operation, add a feature across the landscape but this doesn't by default then negate the features of value that are described in Appendix 7. With regard to potential development at Mingle Lane, this has the potential to impact adversely on the view point if the requirements of Policy S&GS 13 are not

followed, but as set out by CSA Environmental in its environmental briefing note, this should not be the case. At paragraph 3.7 it states: *“whilst residential development at the Site would be visible in middle distance of these views, a strong landscaped boundary to the northern edge of the development would soften views and integrate the new housing into the existing settlement edge. The key contributing features as set out above would also still remain with the development at the site in place, including 180 degrees views across villages and surrounding countryside”.*

The description in Appendix 7 of the submission Plan describes the view as “panoramic long distance views over countryside towards Linton in the far SE; over the development framework of the Plan area towards high land south of the A505 in the SW; and over White Hill, Cambridge and beyond towards Bar Hill in the NW”. The key contributing features to sense of place are then described as:

- *Elevated 180° views across the development framework to high land well beyond the Plan area*
- *A 'landmark viewpoint' (cf. Appeal decision, Reference: APP/W0530/W/21/3280395), giving a new publicly accessible perspective from high ground*
- *Illustrates the connection between the villages and the surrounding S. Cambs. Countryside*
- *Strong sense of topographic variation from rolling chalk hills to clay lowlands, woodland, arable land and settlement.*

View 'T'

Landscape Partnership's independent appraisal refers specifically to the first contributing feature to the sense of place at viewpoint 'T': a “strong sense of countryside, with extensive views over open arable land contained by rolling chalk ridge line to N”. The appraisal states that the “strong sense of countryside will no longer apply due to the potential allocation of land at Mingle Lane, via the emerging draft Local Plan”. But this is despite the fact that View 'T' is directed to the NW and NE, not to the south. The description in Appendix 7 is clear that the view is directed NW to NE across open arable fields, taking in the new countryside park between Haverhill Road and Hinton Way and Fox Hil in the distant NE. The key contributing features to sense of place are then described as:

- *Strong sense of countryside, with extensive views over open arable land contained by the rolling chalk ridge line to N*
- *A tranquil location (as appropriate for a burial ground) partly screened by hedgerows and mature trees*
- *Settled hilltop estate at Fox Hill is a characteristic, wooded feature of local chalkland hills landscape*
- *Visual link between village and new countryside park.*

The independent appraisal does not therefore provide a meaningful rebuttal of view 'T'.

View 'U'

The independent appraisal fails to focus on the key features that are described for this view in Appendix 7 to the S&GS NP. It refers, for instance, to views to the west and SW, whereas

the description in Appendix 7 makes it clear that the view is directed NW to NE, with key contributing features to sense of place being:

- *Strong sense of countryside and tranquillity, with long and broad views over open arable land contained by rolling chalk ridge line to N*
- *Gap in development enables villages to feel strongly connected to surrounding countryside*
- *Within the view, the settled hilltop estate at Fox Hill is characteristic, wooded feature of local chalking hills landscape*
- *Visual link between village and new countryside park.*

The independent appraisal does not therefore provide a meaningful rebuttal of view 'U'.

To conclude, as demonstrated in the assessment provided alongside this document, views 'O' and 'U' are highly important to the Plan area when evaluated against the 7 criteria that define landscape and visual value, and view 'T' is 'important' to the Plan area.

View S

With regard to view 'S', this is one of the views that the Parish Councils have proposed to remove from Policy S&GS 13 and Appendix 7, due to its registering as lower priority than several other views.

Nightingale in relation to S&GS 13

Parish Councils' response: Nightingale commissioned 'CSA Environmental' to undertake a landscape assessment of Mingle Lane/Hinton Way with respect to identified views and proposed ICFs. The Parish Councils note that the assessment has focused specifically on the descriptions provided in Appendix 7 to the S&GS NP. From this perspective, its assessment is far more meaningful than those in other representations concerning the views. The Parish Councils note that CSA Environmental concludes at paragraph 4.2 that, following its own appraisal, "appropriately designed and well landscaped residential development could come forward on the site without compromising any of the identified important views".

With respect to concerns expressed by Nightingale about the number of 'Important Views' identified for the two parishes (not *one* parish as noted by Nightingale) and the Important Countryside Frontage along Mingle Lane, the changes proposed by the Parish Councils earlier in this document address these.

Carter Jonas on behalf of Cambridgeshire County Council in relation to S&GS 13

Parish Councils' response: The consultee has objected to views 'K' and 'P'. The consultee considers that both views are general views of the countryside and do not contain particularly notable landscape or topographical features.

The Parish Councils response to this is as follows:

View 'P'

Views 'P' was identified as part of the landscape character assessment work undertaken in 2019 and falls within landscape character area A1. Page 23 in the LCA 2019 describes the visual characteristics as follows:

"There are extensive long views across the open landscape from high points on Granhams Road and Hinton Way as they cross the ridgeline and panoramic views over the City of Cambridge from A1307 on Babraham Road". The suggested landscape strategy guidelines for the character area state "Conserve key views". The LCA 2019 Appendix includes this view as View 'B'.

Appendix 7 to the NP notes this view as being located on the high point of Granhams Road. The notable landscape and topographical features within this view include both visual and landscape qualities. They are:

- *Strong sense of countryside*
- *Views incorporate wooded Gog Magog Hills and isolated wooded hilltops, which are part of the defining character of the setting of Cambridge*
- *Highlights soft green edge to City on its south side.*

View 'K'

View 'K' falls within landscape character area B2. The visual characteristics (see page 33 in the LCA 2019) include "Predominantly open and flat with extensive long views from the cycle/footpath that bisects the area..." The LCA 2019 Appendix includes this view as View 'S'. It is not accepted that this is a general view of the countryside. There are key features that make important contributions to sense of place at this location on the DNA Path. As described in Appendix 7, these are:

- *strong sense of open countryside between settled area of Great Shelford and Cambridge City*
- *Clear view of White Hill settled hilltip estate, a characteristic feature of local chalkland hills landscape*
- *visual link to treelined Nine Wells local nature reserve, the source of water for early settlement in Great Shelford.*

To conclude, neither view 'P' or 'K' are 'general' views of the countryside. On the contrary, whilst open in nature (and hence typical of many Plan area views), Appendix 7 clearly identifies local characteristics and named and highly recognisable features within their view cones which contribute to a sense of place.

SCDC (para 33) in relation to Policy S&GS 14

Parish Councils' response: SCDC have identified a typo and we agree that paragraph 8.22 should be amended as follows:

NP amendment request/suggestion

“South Cambridgeshire’s 2018 Local Plan (Policy **NPH/13**) recognises the importance of undeveloped land of strong countryside character where it either penetrates or sweeps into the built-up area, providing a significant connection to the rural area beyond or **provides** an important break between two nearby detached parts of the development framework.”

Ely Diocesan Board of Finance in relation to S&GS 15 Local Green Spaces

Parish Councils’ response: We note that the consultee has objected to the designation of Stapleford Allotments on the basis they are already protected by greenbelt. Our response is that whilst the protection given to the land might be similar, greenbelt designations and Local Green Space designations have different purposes. The former is set out in paragraph 143 of the NPPF and the latter set out in paragraphs 105 and 106 of the NPPF. This site is demonstrably special to the Stapleford village community as is explained in the open spaces assessment supporting the submitted S&GS NP. The reasons why it is demonstrably special are distinctly different to the reasons why the land is included in the wider Cambridge Green Belt designation.

Tim Zoll (Property Link Consultants) in relation to Policy S&GS 15 ‘Local Green Spaces and Protected Village Amenity Area’

Parish Councils’ response: The Parish Councils note that Property Link Consultants indicate on Slide 5 in their representation that Grange Field has been removed from the Cambridge Green Belt. This is incorrect. The submission NP identifies Grange Field as an area of Visually Important Open Land. The Parish Councils stand by this, for the reasons outlined in the supporting text to the policy and in Appendix 6 to the submission Plan.

NP amendment request/suggestion

The Parish Councils have noted two errors in this part of the Plan that we would like to seek corrections to:

- site 6 on Map 6 is shown with an incorrect extent. The part of the site that is covered by LGS 2 ‘Great Shelford Recreation Ground’ should be removed from Site 6
- supporting paragraph 8.9 refers to Appendix 7 as setting out how each of the areas of Visually Important Open Land contribute to the character, amenity, tranquillity and function of the two villages, when it is actually Appendix 6 that does this. We wish to correct this.

SCDC (paragraph 39) in relation to Policy S&GS 16

Parish Councils’ response: The objections from SCDC are noted including concern about the impact the policy will have on small schemes. The Parish Councils have amended (the third part added) in light of stakeholder feedback received as part of Regulation 14 consultation.

We do not follow the logic of this comment from SCDC. The policy will only affect proposals that propose, as part of a planning application, the installation of external lighting. External lighting can have an equally harmful impact on biodiversity and the night sky, regardless of

the scale of the development proposal. Through the incorporation of specific standards (e.g. beam angle and colour temperature), the policy assists the applicant and the decision maker in its implementation. The policy will ensure that where external lighting is proposed, the night sky is still protected. What would be the rationale for allowing small scale development to install lighting that would not be permitted as part of a larger scale scheme?

Cambridge Past, Present and Future in relation to Policy S&GS 17

Parish Councils' response: In response to this comment from CPPF, the Parish Councils agree that both provision for and access to natural green space is a priority.

NP amendment request/suggestion

The Parish Councils would be happy to address this point by inserting an additional supporting paragraph between existing paragraph 9.12 and 9.13 to state:

"In line with Objective 4 in this Plan and in line with the aims of the Cambridge Nature Network, there will be a future requirement to improve both the quality and quantity of natural green space across the Plan area including at the Gog Magog Hills, especially as population in the Plan area grows"

In addition, the Parish Councils would be happy to amend Policy S&GS 17 so the following item is set out under 'Other':

- improving both the quantity and quality of natural green space

Finally, the Parish Councils suggest that the table at paragraph 12.11 is amended so that the third bullet under S&GS 17 reads:

"Improving the extent of natural green space, and access to natural green space from settlements to surrounding countryside"

Carter Jonas on behalf of Axis (pg 7) in relation to S&GS 17

Parish Councils' response: In response to Carter Jonas' comment on S&GS 17, we wish to explain that the first clause in Policy S&GS 17 is included to ensure that the policy works, hangs together properly, and can therefore be reliably implemented by users of the Plan. Here, paragraph 041 reference ID 41-041-20140306 is key. It requires:

"A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications."

Camcycle campaigner in relation to supporting text to S&GS 18

Parish Councils' response: We would like to put forward the changes recommended by this consultee.

NP amendment request/suggestion

Supporting paragraph 10.14 to be amended as follows:

“To incentivise active travel, it is important that adequate infrastructure is in place to support users of the active travel network. This includes insisting on the latest design standards, such as LTN 1/20, and ensuring that the condition of roads, pavement surfaces and designated cycle routes is maintained to a high standard...”

SCDC (paragraph 44) in relation to Policy S&GS 19

Parish Councils' response: Lots of work has been undertaken by the Parish Councils and the wider community regarding challenges around traffic volumes, congestion and pedestrian safety. The NP is a unique opportunity to express concerns and priorities in spatial policy terms and, from this perspective, S&GS 19 is a very important policy. It communicates to the decision maker and applicant what to look out for when dealing with development in this area. This is a NP-specific policy that directly adds value to existing policy context at local plan level and national level.

SCDC have commented that the wording of Part 30 of the policy should be reconsidered since most minor developments do not cause adverse impacts and that clarity is required about the scale of development. Our response to this is as stated in Appendix 11 to the Consultation Statement: the nature of the impact is not just linked to the scale of development but also to the sensitivity of the receptor. For this reason, the policy identifies five key sensitive locations. We agree that many minor developments will not exacerbate existing problems to any noticeable degree, but this is already built into the policy wording.

Carter Jonas on behalf of the Ely Diocesan Board of Finance in relation to S&GS 21

Parish Councils' response: We wish to clarify that, with respect to paragraph 11.15, the Parish Councils have engaged with the County Council as landowners about the footpath improvement along Haverhill Road.

Nightingale pg 9 in relation to Policy S&GS 21

Parish Councils' response: We note Nightingale's comment that they have not been engaged on this policy. In response, as set out on page 23 of the Consultation Statement, the Parish Councils undertook landowner engagement in late 2023 through to March 2024, with those implicated by the possible Local Green Spaces, the Protected Village Amenity Areas, the aspirational countryside routes and the countryside enhancements. With regards to Policy S&GS 21, this included landowners and agents representing land identified on Map 14. This does not include land at Mingle Lane/Hinton Way.

Carter Jonas on behalf of Axis in relation to Policy S&GS 21

Parish Councils' response: With respect to the comment regarding landowner engagement, please note that the Parish Councils have engaged with landowners and stakeholders on the identification of improvements. The Parish Councils have engaged as follows with applicable landowners:

- Item 3 'Tree planting along southwest side of Haverhill Road' – the County Council as the owner of highways land has been engaged on this
- Item 4 'New Hedgerows and hedgerow trees corridor' – the land identified is land on the boundary of land owned by St Johns College. Savills engaged on behalf of the College and was supportive in principle about this. See also that Savills have again responded at the Regulation 16 consultation stage
- Item 6 'The Clay Pit' – this is owned by Great Shelford Parish Council
- Item 7 'Hobson's Brook' – the aspirations sought here are consistent with Policy CSF/5 'Countryside Enhancement Strategy' in the Southern Fringe Area Action Plan which states that a strategy will be prepared that comprises the 'creation of a landscape corridor along Hobson's Brook'. As the strategy has not yet come forward since the adoption of the AAP, it is only logical that the S&GS NP identifies this as a priority as part of its Landscape Improvement Plan
- Item 8 'new public open space' – applicable landowners here are members of the Pemberton Family. As part of engagement undertaken pre-Regulation 14 consultation, they responded via Bidwells to state that they recognise the potential for the land adjacent to Nine Wells for environmental enhancement and possible public access. The extent of this land was amended following engagement with a third landowner.

Carter Jonas on behalf of Cambridgeshire County Council in relation to Policy S&GS 21

Parish Councils' response: Item 8 in paragraph 11.32 is for "new public open space sufficiently close to Nine Wells Local Nature Reserve to relieve pressure on Nine Wells LNR and provide an alternative space for local residents and biomedical employees to visit". Carter Jonas object to this space being needed to relieve pressure from biomedical employees on the basis that Local Plan Policy E/2 requires that the CBC extension does not include any pedestrian access from the site to the western, southern and eastern boundaries.

The provision of new public open space on the site shown on Map 14 will have an important function in providing an alternative space for residents, other workers and biomedical employees. Nine Wells Local Nature Reserve can be accessed via multiple routes, none of which require any direct access from the site noted by Carter Jonas. For example, there is access from the DNA Path and from another cycle path running west from the eastern end of Dame Mary Archer Way. The Cambridge Group of the Ramblers in its Reg. 16 representation also explains that:

"Nine Wells wood is accessed partly by Great Shelford Public Footpath 2, but also by permissive paths running from both the Addenbrookes complex and Urwin Gardens. A footpath also runs alongside the western edge of Nine Wells, linking up with the Great Shelford to Addenbrookes DNA cycle path. These paths mean that it is possible to access Nine Wells directly from Great Shelford Village and also provide circular walks from Addenbrookes itself."

Note that access from the DNA Path is via an informal permissive path.

It is incorrect to imply that the NP steering group has not undertaken landowner engagement in developing this policy. Landowners known to be impacted by the proposed areas for landscape improvement were contacted in December 2023 and January 2024.

It is implied by Carter Jonas in their letter that Cambridgeshire County Council own land that is covered by the land identified on Map 14 as a location for a new public open space at Nine Wells. This same consultee did not indicate this in their response provided to the Parish Councils at Regulation 14 stage. Indeed, Parish Council records and the Land Registry show that this land is owned by members of the Pemberton Family and not the County Council. Cambridgeshire County Council do own sections of the DNA Path, but this is the path which runs adjacent to the site.