

Stapleford and Great Shelford Neighbourhood Development Plan 2024-2041

**A report to South Cambridgeshire District Council
on the Stapleford and Great Shelford
Neighbourhood Plan**

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Executive Summary

- 1 I was appointed by South Cambridgeshire District Council in February 2025 to carry out the independent examination of the Stapleford and Great Shelford Neighbourhood Development Plan.
- 2 I visited the neighbourhood area on 4 March 2025. The examination was undertaken by written representations.
- 3 The Plan includes a range of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on safeguarding local character and ensuring that the Green Belt is respected. It proposes the designation of a series of local green spaces.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been actively engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Stapleford and Great Shelford Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
16 May 2025

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Stapleford and Great Shelford Neighbourhood Development Plan 2024-2041 (the 'Plan').
- 1.2 The Plan has been submitted to South Cambridgeshire District Council (SCDC) by Stapleford Parish Council (SPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan. The Introduction advises that Great Shelford Parish Council has been equally involved in the preparation of the Plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) 2012 and its updates in 2018, 2019, 2021, 2023 and 2024. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises because of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive, and to be complementary to the development plan. It has a clear focus on securing high quality design and safeguarding the relationship between the neighbourhood area and Cambridge. It proposes a series of local green spaces.
- 1.6 Within the context set out above this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then be used to determine planning applications within the Plan area and will sit as part of the wider development plan.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by SCDC, with the consent of both parish councils, to conduct the examination of the Plan and to prepare this report. I am independent of both SCDC and SPC. I do not have any interest in land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. I have 42 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have significant experience of undertaking other neighbourhood plan examinations. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted proceeds to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Sections 7 and 8 of this report.

Other examination matters

- 2.6 In examining the Plan I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report. I am satisfied that the submitted Plan complies with the three requirements.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan;

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- the Basic Conditions Statement;
- the Consultation Statement and the appendices;
- the SEA/HRA Screening Determination Statement;
- the Design Guidance and Codes;
- the Landscape Character Assessment (and its Addendum)
- the Housing Needs Assessment
- the Assessment of Local Green Spaces;
- SPC's responses to the Clarification Note;
- the representations made to the Plan;
- the adopted South Cambridgeshire Local Plan;
- the adopted Cambridge Southern Fringe Area Action Plan;
- the National Planning Policy Framework (NPPF) - December 2023 and December 2024;
- Planning Practice Guidance; and
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 4 March 2025. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. The visit is covered in more detail in Section 5 of this report.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the available information, including the representations made to the submitted Plan, I was satisfied that the Plan could be examined by written representations.

The 2024 update of the NPPF

3.4 The NPPF was updated on 12 December 2024. Paragraph 239 of the NPPF 2024 sets out transitional arrangements for plan-making. It comments that the policies in the Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025.

3.5 On this basis, the examination of the Plan against the basic condition that it should have regard to national policies and advice contained in guidance issued by the Secretary of State is based on the 2023 version of the NPPF. Plainly the Plan was submitted in 2024 in that context. Where NPPF paragraph numbers are used in this report, they refer to those in the December 2023 version.

3.6 Paragraph 6.2 of this report sets out the full extent of the basic conditions against which a neighbourhood plan is examined.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such, the regulations require neighbourhood plans to be supported and underpinned by public consultation.

- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012, SPC prepared a Consultation Statement. It sets out the mechanisms that were used to engage the community and statutory bodies in the plan-making process. It also provides specific details about the consultation process that took place on the pre-submission version of the Plan (March to April 2024). It captures the key issues in a proportionate way and is underpinned by more detailed appendices.
- 4.3 The Statement is particularly helpful in the way in which it reproduces elements of the consultation documents used throughout the plan-making process. Their inclusion adds life and depth to the document.
- 4.4 The Statement sets out details of the comprehensive range of consultation events that were carried out in relation to the initial stages of the Plan. They are arranged into the phases of the Plan as follows:
- the early work (Section 2);
 - the general approach taken (Section 3);
 - the initial plan development (Section 4);
 - the advanced plan development stage (Section 5); and
 - the pre-submission stage (Section 6).
- 4.5 I am satisfied that the engagement process was both proportionate and robust. In many instances, the ways in which the parish councils engaged the community and statutory bodies was extremely thorough and detailed.
- 4.6 Appendices 10 and 11 of the Statement provides details on the comments received on the pre-submission version of the Plan. Appendix 12 identifies the principal changes that worked their way through into the submission version. This information helps to describe the evolution of the Plan.
- 4.7 Consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. SCDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Representations Received

4.8 Consultation on the submitted plan was undertaken by SCDC that ended on 12 February 2025. This exercise generated comments from a range of organisations as follows:

- Historic England
- Natural England
- Nightingale Land
- Transport for London
- Cambridge Group of Ramblers
- North Hertfordshire District Council
- NHS Property Services
- Property Link Consultants
- Ely Diocesan Board of Finance
- East West Rail Group
- Axis Land Partnerships
- Anglian Water Services Limited
- Cambridgeshire Constabulary
- Cambridgeshire County Council (Assets Team)
- Cambridgeshire County Council
- The Association for Cultural Exchange
- Pigeon Land and Lands Improvements Holdings Limited
- Cambridge Past, Present and Future
- Harston Parish Council
- Great Shelford (Ten Acres)
- St John's College, Cambridge
- Swift Local Network
- Environment Agency
- Forestry Commission
- National Highways
- Sport England
- South Cambridgeshire District Council

4.9 Comments were also received from several individuals.

4.10 I have taken account of all the representations received. Where it is appropriate to do so, I refer to specific representations in my assessment of the policies in Section 7 of this report.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area consists of the parishes of Stapleford and Great Shelford. It is located to the south of Cambridge. It was designated on 8 November 2016.
- 5.2 As the Plan describes, the neighbourhood area consists of two main separate settlements – Stapleford and Great Shelford. Stapleford has its own primary

school and affiliated nursery, a Spar shop, two pubs, Stapleford Granary (an arts centre with its own café), a builder's merchant, and a small number of other businesses. The Gog Farm Shop is to the east of the main settled area. Great Shelford has a wider range of amenities, including a primary school, small business centre, public library, pharmacy, healthcare centre, post office, several pubs, cafes and restaurants, a large garden centre (Scotsdales), and several independent and national chain grocers.

- 5.3 The neighbourhood area is well-connected to Cambridge via road and rail links, public buses and, just outside its borders, park-and-ride sites. In addition, there is a choice of active travel options. This includes the national cycle network route 11 that runs through the neighbourhood area, where it connects Great Shelford to Cambridge (including Addenbrooke's Hospital) via an off-road route adjacent to the railway line. Shelford Station on the West Anglia Main Line to London Liverpool St Station and Cambridge. The M11 cuts through the far west of the neighbourhood area and connects the villages to the north and south of the UK via junctions 10 and 11.

Development Plan Context

- 5.4 The development plan covering the neighbourhood area is the South Cambridgeshire Local Plan. It was adopted in 2018 and covers the period up to 2031. Policy S/6 (The Development Strategy) focuses new development on the edge of Cambridge, at new settlements and, in the rural areas at Rural Centres and Minor Rural Centres. The Cambridge Southern Fringe Area Action Plan also affects the neighbourhood area.
- 5.5 Policy S/8 identifies a series of Rural Centres, including Great Shelford and Stapleford. The policy advises that development and redevelopment without any limit on individual scheme size will be permitted within the development frameworks of Rural Centres, as defined on the Policies Map, provided that adequate services, facilities, and infrastructure are available or can be made available as a result of the development. The development framework for Great Shelford and Stapleford is shown on Inset Map 45.
- 5.6 In addition, the following policies in the Local Plan have been particularly important in influencing and underpinning the various policies in the submitted Plan:

Policy S/4 Green Belt
 Policy HQ/1 Design Principles
 Policy NH/14 Heritage Assets
 Policy H/10 Affordable Housing
 Policy H/18 Working at Home
 Policy E/16 Expansion of Existing Businesses in the Countryside
 Policy E/19 Tourist Facilities and Visitor Attractions

Policy SC/3 Protection of Village Services and Facilities
 Policy SC/4 Meeting Community Needs
 Policy SC/7 Outdoor Play Space, Informal Open Space and New Developments
 Policy SC/8 Protection of Existing Recreation Areas

- 5.7 The Cambridge Southern Fringe Area Action Plan was adopted in February 2008. It sets out the planning policies to guide the development on the southern edge of Cambridge at Trumpington Meadows.
- 5.8 The submitted Plan has been prepared within its wider adopted development plan context. In doing so, it has relied on up-to-date information and research that has underpinned existing planning policy documents in the District. This is good practice and reflects key elements in Planning Practice Guidance on this matter. It is also clear that the submitted Plan seeks to add value to the different components of the development plan and to give a local dimension to the delivery of its policies. This is captured in the Basic Conditions Statement.
- 5.9 SCDC is working with Cambridge City Council to produce the Greater Cambridge Local Plan for their joint administrative areas. This is a major undertaking and will provide an updated development plan for the period up to 2041. The Local Development Scheme anticipates that the Plan will be submitted for its examination in December 2026. Whilst the emerging Plan is not at a sufficiently advanced stage to have a bearing on the examination of the neighbourhood plan, I comment on its potential implications in the section on Monitoring and Implementation in paragraphs 7.136 and 7.137 of this report.

Unaccompanied Visit

- 5.10 I visited the neighbourhood area on 4 March 2025. I approached from the A1301 from the south. This allowed me to understand its setting in the wider landscape and its proximity to the main road network.
- 5.11 I looked initially at the series of proposed Local Green Spaces off Haverhill Road and around the Stapleford Recreation Ground. I saw that they were separate entities with their own land uses. I saw their relationship to the village and to the surrounding countryside.
- 5.12 I then drove along Haverhill Road to the Magog Down Country Park. I saw its attractiveness and popularity. I also saw the extensive views of the southern edge of Cambridge from Haverhill Road.
- 5.13 I then looked at the proposed Important Countryside Frontages in Stapleford off Gog Magog Way and Mingle Lane.

- 5.14 I then drove along Hinton Way to the roundabout with the A1301. This allowed me to see elements of the proposed Improved Landscape Area.
- 5.15 I then looked at Great Shelford Village Centre. I saw its range of retail and commercial uses, a series of heritage assets, including several timber-framed and thatched buildings. I saw the close relationship between the village centre and the very popular recreation ground. I saw the concentration of historic buildings around St Mary the Virgin Church and the River Cam. I also saw the importance of the adjacent school to the local community.
- 5.16 I drove along Granham's Road and looked at the proposed local green space (Horse Field No 3). I also looked at the proposed local green space from Macaulay Avenue.
- 5.17 I left the parish along on the A1301 (Cambridge Road) to Addenbrooke's Road and the M11. This highlighted the strategic location of the neighbourhood area to the south of Cambridge.

6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped considerably in the preparation of this section of the report. It is a well-presented and informative document. It is also proportionate to the Plan itself.
- 6.2 As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan in the area;
- not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

6.3 I assess the Plan against the basic conditions under the following headings.

National Planning Policies and Guidance

6.4 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in December 2023. This approach is reflected in the submitted Basic Conditions Statement.

6.5 The NPPF sets out a range of core land-use planning issues to underpin both plan-making and decision-taking. The following are relevant to the Stapleford and Great Shelford Neighbourhood Plan:

- a plan led system– in this case the relationship between the neighbourhood plan and the South Cambridgeshire Local Plan and the Cambridge Southern Fringe Area Action Plan;
- delivering a sufficient supply of homes;
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.7 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.
- 6.8 Having considered all the evidence and representations available as part of the examination I am satisfied that subject to the recommended modifications in this report that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a positive vision for the future of the neighbourhood area within the context of its status within the development strategy in the Local Plan and the scale and nature of the Cambridge Green Belt. It also includes a package of proposed Local Green Spaces. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.
- 6.9 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This is reinforced in Planning Practice. Paragraph ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.
- 6.10 As submitted the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to Sustainable Development

- 6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes a policy for the residential annexes (Policy S&GS5). In the social dimension, it includes policies on housing mix (Policy S&GS 1), on local housing needs (Policy S&GS 2), on the housing needs of older people (Policy S&GS 5) and on local green spaces (Policy S&GS 15). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It includes policies on design (Policy S&GS 6), on climate change (Policy S&GS 7), on biodiversity (Policy S&GS 9), on landscape character (Policy S&GS 12), and on views (Policy S&GS 13). SPC

has undertaken its own assessment of this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.12 I have already commented in detail on the development plan context in South Cambridgeshire in paragraphs 5.4 to 5.9 of this report.
- 6.13 I consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the development plan. Subject to the incorporation of the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.14 The Neighbourhood Plan General Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.15 In order to comply with this requirement SCDC commissioned a Screening Assessment. The report (February 2024) is thorough and well-constructed. It concludes that the Plan does not allocate any land for development purposes and seeks to strengthen the protection and enhancement of assets at the local level and in a local context. As such Plan can be screened out for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC.

Habitats Regulations Assessment

- 6.16 The screening report also undertook a Habitats Regulations Assessment (HRA) of the Plan. It is equally thorough on this matter. It advises that the HRA Screening stage identifies that, without mitigation, further consideration is not required at the Appropriate Assessment stage to determine whether the Plan either alone or in combination with other plans and projects, would adversely affect the integrity of Eversden and Wimpole Woods SAC. This HRA screening report recommends that policies supporting development do not need to be assessed further either alone or in-combination with other plans and projects. It also advises that embedded mitigation measures for projects and planning applications will need to be considered in project level HRA/AA reports assessed by SCDC and secured by a condition attached to any planning consent. As such it concludes that there is no need for further assessment of the Plan.

- 6.17 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood planning obligations.

Human Rights

- 6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. The Basic Conditions Statement comments that an assessment has been carried out of the potential impacts of the Plan in relation to the protected characteristics as identified in the Equality Act 2010. This assessment is included as Table 7 of the Basic Conditions Statement and shows that the Plan is not likely to lead to increased inequalities or discrimination in the Plan area.
- 6.19 In addition, there has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. Based on all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.20 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and the two parish councils have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.

- 7.4 The Plan has three important elements. The first is the way in which several of the policies are directly underpinned by technical appraisals. The second is its clear and well-structured presentation. The third is that the supporting text of each policy includes a background context and policy rationale which helps considerably in explaining its purpose.
- 7.5 The Plan has been designed to reflect Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land.
- 7.6 I have addressed the policies in the order that they appear in the submitted Plan. For clarity, this section of the report comments on all the Plan's policies.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial parts of the Plan (Sections 1 to 5)

- 7.8 The Plan is very well-organised and presented. It has been prepared with much attention to detail and local pride. It makes an appropriate distinction between the policies and their supporting text. The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.
- 7.9 The Introduction (Section 1) comments about the neighbourhood plan agenda in general and identifies the Plan period (in paragraph 1.1). It also comments about the reasoning for the preparation of the Plan.
- 7.10 Section 2 provides information about the neighbourhood area. The interesting and comprehensive details help to set the scene for the policies.
- 7.11 Section 3 comments about the local planning context within which the Plan has been prepared.
- 7.12 Section 4 comments about the issues which arise from a SWOT analysis of the neighbourhood area. It also identifies issues which are not addressed in the Plan.
- 7.13 Section 5 comments about the vision, themes, and objectives of the Plan. The Vision neatly summarises the ambition for the neighbourhood area as follows:

'In 2041, Stapleford and Great Shelford will be thriving villages distinct from Cambridge, where people want to live, work, shop, and play. We value and want to protect our landscape setting, improve its biodiversity, and reduce our contribution to climate change. Modest new development, which is sensitively and sustainably designed, will focus on addressing identified housing needs, in particular affordable housing needs, within our community. Where

appropriate, it will also support the creation of new amenities and infrastructure to meet the needs of our population. Part of this infrastructure will be a safe and sustainable travel network supporting everyday journeys and healthy recreation.'

- 7.14 The Vision is underpinned by ten theme-based objectives which then form a structure for the resulting policies. This assists considerably in helping those unfamiliar with the Plan to navigate their way through its contents. Thereafter, each policy sets out its background context, its rationale, and its relationship with any relevant policies in the Local Plan. This is best practice.
- 7.15 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.6 and 7.7 of this report.

Policy S&GS 1 Housing mix

- 7.16 The Plan comments that an over-supply of large properties and lack of affordable, smaller properties mean that market housing in Stapleford and Great Shelford is out of reach to most. It then advises that new development should meet the existing and future needs of the community in terms of home size and affordability, and be adaptable and accessible to residents as they age. The policy is underpinned by the Housing Needs Assessment 2023 (HNA).
- 7.17 The policy comments that development proposals that create one or more new dwellings must prioritise the delivery of smaller homes (3 bedrooms or less) over larger homes. It also advises that for larger schemes (5 or more new dwellings), the policy provides a starting point for the determination of an appropriate housing mix.
- 7.18 In general terms, the policy takes a positive approach to the local circumstances in the neighbourhood area and is underpinned by the HNA. SCDC, Nightingale land and Ten Acres raises overlapping comments on the policy. I note the commentary made by Nightingale Homes about the delivery of First Homes. However, as explained in Section 3 of this report, the Plan is examined against the contents of the December 2023 version of the NPPF rather than the 2024 version. In any event part c) of the submitted policy comments only about the discount for First Homes rather than any specific percentage delivery of affordable housing as First Homes.
- 7.19 I have considered the various comments and SPC's responses to the clarification note carefully. Based on all the available evidence, I recommend the following modifications to the policy to bring the clarity required by the NPPF and to allow SCDC to be able to apply the policy through the development management process:

- a revision of the opening element of the policy so that it relates to two homes rather than to a single dwelling;
- the application of the policy's starting point (for a substantive mix of homes) to ten homes rather than five. This will bring a much more realistic approach to the package of measures proposed;
- a replacement of the unnecessarily prescriptive commentary on the size dwellings other than three bedrooms in part a);
- commentary throughout the policy about needing to balance the mix of housing with commercial viability; and
- a revision of the third part of the policy which comments about the accessibility standards to which new homes are delivered so that it acknowledges that such delivery will always be appropriate or commercially viable.

7.20 Otherwise the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the first part of the policy with:

'Wherever it is commercially viable to do so, development proposals that create two or more new dwellings should prioritise the delivery of smaller homes (three bedrooms or less) over larger homes.'

For development proposals which would deliver ten or more homes, the following provides a starting point for the determination of an appropriate housing mix:'

Replace the first bullet point of a) with: 'at least 50% of new dwellings to be 3-bedroom units and remaining units to be a mixture of other sizes.'

Replace the second part of the policy with: 'Development proposals which would provide an alternative mix to that set out above should be justified by reference to up-to-date evidence of existing and future needs in the neighbourhood area, to evidence on its viability, and/ or to local site-specific circumstances.'

Replace the third part of the policy with: 'Wherever appropriate and commercially-viable, new housing should be built to the accessible and adaptable Building Regulations M4(2) standard.'

Policy S&GS 2 Prioritising local needs in the allocation of affordable housing

7.21 The supporting text comments that there is a high level of affordable housing need in the neighbourhood area which even significant new development will struggle to meet. In this context the policy comments that households with a strong local connection to either of the two parishes (as defined in the

supporting text) whose needs are not met by the open market will be given priority of allocation (i.e. will be first to be offered tenancy or shared ownership of the home) for 50% of affordable homes (including First Homes) being delivered on the following sites outside the current (2024) village development frameworks, including where these are being delivered via a S106 agreement as part of an open market scheme.

- 7.22 SCDC generally support the policy. Developers question the extent to which it is a land use planning policy. I raised this matter with SPC. In its response to the clarification note it advised that:

‘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.’

- 7.23 I have considered this matter very carefully. On the balance of the evidence, and given the collaborative local approach taken, I am satisfied that the policy meets the basic conditions and complements the approach taken in the previous policy. Nevertheless, I recommend a detailed modification to the wording used. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

In the first part of the policy replace ‘will be given priority’ with ‘should be given priority’

In the second part replace ‘plan area’ with ‘neighbourhood area’

Policy S&GS 3 Rural exception housing

- 7.24 The policy advises that proposals for the development of small-scale affordable housing schemes on rural exception sites adjoining either of the two village development framework boundaries will be supported subject to a series of criteria.
- 7.25 SCDC made representations about the overlap between the submitted policy and Policy H/11 of the Local Plan as follows:

The policy overlaps with the requirements of Local Plan Policy H/11, especially clause 1. Our pre-submission comments raised concerns that this policy provided support for small-scale rural exception sites but lacked clarity regarding support for larger-scale rural exception sites. We acknowledge that paragraph 6.42 has been introduced to the plan to provide additional detail in relation to scale. However, including the final sentence that states ‘schemes would not be expected to exceed 25 units’ is not supported as specifying a maximum indicative size is not in conformity with part 1b of Policy H/11 which only requires that the development is of a scale appropriate to the size, facilities, and character of the settlement.

We also note that the policy refers to ‘small-scale’ whereas both the NPPF and adopted Local Plan Policy H/11 refer to ‘small sites’, and therefore we suggest that the wording should be amended to ‘small sites’ to provide consistency between the terms in the Neighbourhood Plan, NPPF and Local Plan.

7.26 In its response to the clarification note SPC commented 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.’

7.27 I have considered the various issues very carefully. On the balance of the evidence, I am satisfied that the policy brings added value beyond the content of Policy H/11 of the Local Plan. In addition, criterion 1c ensures that the submitted policy will complement the contents of Policy H/11. Within this broader context I recommend the following modifications to bring the clarity required by the NPPF and to allow SCDC to be able to apply its provisions through the development management process:

- a revision to the wording used in the first part of the policy so that it comments about small sites to achieve consistency with the approach taken in national and local policies;
- a revision of the wording used in part 1e) of the policy; and
- revisions to the supporting text to clarify the size of schemes which would overlap with the contents of the policy.

7.28 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the opening element of the first part of the policy with:
‘Proposals for the development of affordable housing schemes on rural**

exception small sites adjoining either of the two village development framework boundaries will be supported provided that:’

Replace 1e) with: ‘wherever practicable, proposals provide or link up with existing sustainable (e.g. active travel) routes into either of the villages and the City of Cambridge.’

Replace 6.42 with:

‘Policy S&GS 3 is included in the Plan to clarify support in principle for rural exception housing schemes in the neighbourhood area, subject to the criteria set out in the policy. The policy refers to small site’ 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 rural exception site will be informed by 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.’

Policy S&GS 4 Meeting the needs of the older population

- 7.29 The supporting text advises that the proportion of people aged 75+ in Stapleford and Great Shelford is projected to grow from 13.3% in 2021 to 20.7% in 2043. It also comments that development proposals for specialist housing for older people should be located within the settled area of the villages and in locations easily accessible to shops, services, and other community facilities.
- 7.30 The policy advises that development proposals providing specialist housing for the older generation (including retirement housing, sheltered housing and extra care housing) will only be supported where a series of criteria are met. It also comments about the need for such proposals to create an attractive streetscene.
- 7.31 SCDC comments about the wording used in criterion f of the policy (which addresses developer contributions to health care facilities). SPC suggested a revision to the wording in its response to the clarification note. I recommend a slight variation of that suggestion as a modification to the Plan. It will bring the clarity required by the NPPF and ensure that it has regard to national policy on developers’ contributions. I also recommend other very specific modifications to the wording used elsewhere in the policy to bring both clarity and simplicity to the policy.
- 7.32 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

In parts 1a) and b) replace ‘proposals’ with ‘they’

Delete 1f)

In part 2 of the policy replace ‘will be expected to’ with ‘should’

Add a third part of the policy to read:

‘Where necessary to meet the healthcare needs of the future occupants and to mitigate the additional demand placed on healthcare provision in the neighbourhood area, financial contributions towards the provision of healthcare infrastructure will be sought from the proposed development which directly, fairly, and reasonably relate in scale and kind to the development.’

Policy S&GS 5 Residential annexes to facilitate multi-generational living

- 7.33 The supporting text advises that homes which are suitable for multi-generational living will be encouraged and can play a part in meeting a specific housing need, growth of which may be driven by particularly high housing costs and an overall rise of the population aged 75+. It also comments that multi-generational living allows older people to continue to live at home whilst being close to family members who can support them as and when their needs change. The policy comments that the development of a single residential annexe wholly within the curtilage of an existing residential dwelling will be supported where the supplemental dwelling meets a series of criteria.
- 7.34 Plainly the policy will help to deliver the Plan’s broader ambition to facilitate multi-generational living. I have noted SCDC’s detailed comments on the policy. I have also carefully considered SCDC’s comments on the wording used and SPC’s responses to the clarification note. Based on all the evidence, I recommend the following package of modifications to the policy to bring the clarity required by the NPPF and to allow SCDC to apply the policy consistently through the development management process:
- the incorporation of the location element (1g) into the opening element of the first part of the policy;
 - the replacement of ‘supplemental dwelling’ with ‘annexe’ in the first part of the policy; and
 - other modifications to the wording of criterion 1c.
- 7.35 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the first part of the policy with:

‘The development of a single residential annexe wholly within the curtilage of an existing residential dwelling within the development frameworks of the two parishes will be supported where the annexe:’

In c) replace ‘appears’ with ‘is’

Delete 1g

Policy S&GS 6 Development and design in Stapleford and Great Shelford

- 7.36 The Plan advises that without wishing to stifle creativity, the policy seeks to ensure that new development is in keeping with the variety of buildings and street scenes in the two villages
- 7.37 The policy comments that development proposals should be guided by the 2023 ‘Stapleford and Great Shelford Design Guidance and Codes’, and where applicable the 2021 ‘Stapleford Conservation Area Character Appraisal’ or the 2007 ‘Great Shelford Conservation Area Character Appraisal’, and accord with a series of design principles.
- 7.38 In general terms the policy provides a comprehensive local approach to Section 12 of the NPPF. SCDC comments that the overlaps between the policy and the Design Guidance and Codes results in a lengthy policy. Whilst this is the case, SPC has clearly sought to ensure that the policy and the Design Guidance and Codes’ work in harmony. As such I am satisfied that the length of the policy is not a basic conditions issue.
- 7.39 I recommend that the first part of the policy is applied proportionately. Whilst design is universally important many of the principles in the policy will not directly apply to minor or domestic proposals.
- 7.40 The third part of the policy is supporting text (in advising about how developers should submit a planning application) rather than a land use policy. As such I recommend that it is deleted and repositioned into the supporting text.
- 7.41 Nightingale Land comments about the restrictive approach taken in relation to design principle RH11. I note SPC’s response to this issue in the clarification note and recommend that it is included in the supporting text.
- 7.42 Ten Acres makes detailed comments on the Design Guidance and Codes. However, I am satisfied that SCDC will be able to determine planning applications within the context of the wider development plan.
- 7.43 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

In the first part of the policy replace ‘Development proposals’ with ‘As appropriate to their scale, nature and location, development proposals’

**Replace the opening element of the second part of the policy with:
'Development proposals should ensure a good standard of amenity for people.'**

Delete the third part of the policy.

At the end of paragraph 6.71 add:

'Descriptions as to how a development scheme complies with the policy should be provided in the Design and Access statement or Planning Statement, as applicable. The submission of a completed design checklist (Appendix 2) is encouraged.'

The element of the policy which applies to principle RH11 (1i) will 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 of the neighbouring character area.'

Policy S&GS 7 Mitigating and adapting to climate change through buildings design

- 7.44 The supporting text advises that the Plan aims to reduce greenhouse gas emissions and ensure that new developments address problems which are likely to occur in the Plan area due to climate change. It also comments that sustainability statement relating to energy efficiency and water usage must accompany all new development proposals and that innovative ways to achieve low or net-zero carbon buildings are encouraged
- 7.45 The policy has two related parts. The first comments that development proposals which adopt innovative approaches to the construction of low and net zero carbon homes, extensions, and buildings, and which demonstrate sustainable use of resources and high energy efficiency levels (e.g. construction to Passivhaus or similar standards) will be supported. The second comments that development proposals involving new buildings, dwellings, and residential extensions, must be accompanied by a Sustainability Statement.
- 7.46 Comments were made on the policy by SCDC and developers about the potentially onerous nature of the policy and the extent to which the sustainability of new buildings is already controlled through the Building Regulations. In its response to the clarification note SPC advised as follows:

'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.'

- 7.47 I have considered these issues very carefully and in the context of the Written Ministerial Statement Planning: Local Energy Efficiency Standards Update (December 2023). In doing so I have sought to balance local ambitions with national policy on this increasingly important matter. On the balance of the evidence, I have concluded that the combination of the second and third parts of the policy (including the need for developers to produce a Sustainability Statement) would result in a very prescriptive approach towards new development in the neighbourhood area. Whilst the broader package of measures avoids requiring specific solutions (such as Passivhaus), their cumulative effect would have a similar outcome. Whilst I agree with SPC that many of the elements included in the policy reflect best practice, the contents of the Written Ministerial Statements are clear that building efficiencies should be controlled through the Building Regulations.
- 7.48 In these circumstances I recommend the deletion of the second and third parts of the policy. However, given the local enthusiasm for such measures, I recommend that these elements of the policy (and associated elements of the supporting text) are represented as a best practice guide to supplement the more general approach taken in the first part of the policy. In this context I recommend specific modifications to the wording used in the first part of the policy so that it can be applied by SCDC through the development management process.
- 7.49 The fourth and fifth parts of the policy comment about sustainable drainage systems and surface water run-off. In general terms they meet the basic

conditions. However, I recommend detailed modifications to these elements of the policy to bring the clarity required by the NPPF and to reflect that the proposed approaches may not always be practicable.

- 7.50 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the first part of the policy with: ‘Development proposals which adopt innovative approaches to the construction of low and net zero carbon homes, extensions, and buildings, and which demonstrate sustainable use of resources and high energy efficiency levels (such as Passivhaus or similar standards) will be supported.’

Delete the second and third parts of the policy.

Replace the fourth part of the policy with: ‘Proposals for major development should incorporate Sustainable Drainage Systems (SuDs) and infiltration SuDs should be used wherever practicable subject to infiltration SuDs being suitable to the location.’

Replace the fifth part of the policy with: ‘All other development proposals involving new buildings or which increase areas of impermeable surfaces should demonstrate that all surface water run-off is accommodated within the site using appropriate surface water drainage arrangements in general, and SuDs wherever practicable.’

Replace paragraphs 7.27 to 7.37 with:

‘Sustainability Best Practice Guide

Policy S&GS 7 offers support for development proposals which adopt innovative approaches to the construction of low and net zero carbon homes, extensions, and buildings, and which demonstrate sustainable use of resources and high energy efficiency levels (such as Passivhaus or similar standards). The approach supplements Local Plan Policy CC/1 ‘Mitigation and Adaptation to Climate Change’ which requires applicants to submit a sustainability statement. The Local Plan is supported by the Greater Cambridge Sustainable Design and Construction SPD, in which Appendix 1b provides a comprehensive checklist for the contents of such a sustainability statement.

This part of the Plan sets out a best practice guide for developers on ways in which a positive response to these policies can be applied.

The following are matters where development proposals can deliver future-proofed (climate change adapted) buildings and associated green

infrastructure with respect to extreme weather events (heatwaves, drought, and flood events):

- *providing external shading, where needed to avoid overheating during the lifetime of the building and taking account of rising temperatures;*
- *ensuring that all new buildings are well ventilated, paying special attention to building types or parts of buildings at higher risk, such as flat-roofed buildings and top floor flats;*
- *using or planting trees and vegetation in and around built structures;*
- *designing-in systems for rainwater capture/harvesting and greywater recycling; and*
- *minimising the area of impermeable surfaces and incorporating green or biodiverse roofs where practical.*

The preparation of a sustainability statement to support planning applications can assist in delivering best practice. They describe how a scheme:

- *applies the energy hierarchy;*
- *adopts a ‘whole building approach’, or in the case of a refurbishment project a ‘fabric first’ approach, to optimising energy efficiency; and*
- *minimises water use.*

In the case of smaller applications, such as residential extensions, rather than preparing a separate document the ‘sustainability statement’ could be included as a section in the Planning Statement which is prepared alongside the application.

Where appropriate, major development proposals can include a whole-life cycle carbon emissions assessment to demonstrate actions taken to reduce embodied carbon resulting from the construction and use of the building over its lifetime. The Royal Institute for Chartered Surveyors (RICS) has a useful methodology in place.

Sustainability statements typically include details about:

- *how the energy hierarchy has been applied in the approach to minimising the overall energy demand of a proposed building;*
- *the calculated space heating demand expressed in kWh/m²/yr;*
- *the calculated energy use intensity expressed in kWh/m²/yr;*
- *where renewables are being installed, the electricity generation intensity in terms of kWh/m²fp/yr; and*
- *the estimated water consumption wherever applicable, noting that for some applications water usage may not be affected by the proposal. For residential development proposals, water consumption should ideally be set at no more than 110 litres per person per day and ideally at 80 litres per person per day. For non-residential development proposals, the building’s water efficiency performance should be provided using the BREEAM Wat 01 calculator.*

Sustainability statements can also usefully include information on any climate change adaptation measures which have been incorporated, such as the use of external shading to prevent overheating of buildings.

Applicants preparing sustainability statements are signposted to the Net Zero Carbon Toolkit and Retrofit Guides referenced in the Plan.'

Policy S&GS 8 Renewable energy schemes in Stapleford and Great Shelford

- 7.51 The supporting text recognises that low carbon and renewable energy infrastructure is an important part of the pathway to achieving net zero. The policy comments that proposals for small-scale community-led renewable or low carbon energy projects will be supported where a series of criteria are met.
- 7.52 In general terms the policy takes a positive approach to this matter and has regard to Section 14 of the NPPF. I am satisfied that the criterion on local community involvement and leadership is entirely appropriate. I note the comments from SCDC and SPC's responses to the clarification note. On the balance of the evidence, I am satisfied that the policy adds value to the development plan. Nevertheless, I recommend that the wording used in the opening element is simplified to bring the clarity required by the NPPF.
- 7.53 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'Proposals for small-scale community-led renewable or low carbon energy projects will be supported provided that:

- a) they protect or enhance landscape character in line with Policy S&GS 12; and**
- b) they demonstrate local community involvement and leadership (such as being led by a community land trust).'**

Policy S&GS 9 Protecting and enhancing nature networks and sites of biodiversity value in Stapleford and Great Shelford

- 7.54 The supporting text comments about the biodiversity assets in the neighbourhood area and that when new development takes place, the value of the biodiversity assets must be considered and opportunities taken to enhance them.
- 7.55 The policy has two related parts. The first part comments that development proposals which either directly or indirectly impact a site of biodiversity value in the neighbourhood area must take account of its biodiversity value and follow the mitigation hierarchy as detailed in Policy S&GS 10. The second part

comments that all development proposals will be expected to take available opportunities to create or strengthen links between existing and/or new habitats through the development site.

7.56 In general terms the policy takes a positive approach to these matters which has regard to Section 15 of the NPPF. Nevertheless, to bring the clarity required by the NPPF and to allow SCDC to be able to apply the policy through the development management process I recommend the following package of modifications:

- a revision to the wording used in the first part of the policy to recognise the role played by a neighbourhood plan in the wider development plan;
- the inclusion of a proportionate element into the second part of the policy; and
- the use of the correct terminology for the neighbourhood area throughout the policy.

7.57 I also propose modifications to the schedule of biodiversity sites listed in the first part of the policy based on SPC's helpful response to the comments received during the consultation period. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

In the first part of the policy replace 'must' with 'should' and 'Plan area' with 'neighbourhood area'

In the first part of the policy delete Stapleford Pits from the Local Nature Reserves element and include Stapleford Pit and Magog Down in the schedule of County Wildlife Sites

In the second part of the policy replace 'All development proposals will be expected to take available opportunities' with 'As appropriate to their scale, nature and location, development proposals should take reasonable and available opportunities' and 'Plan area' with 'neighbourhood area'

Policy S&GS 10 Mitigation hierarchy and delivering biodiversity net gain and enhancements

7.58 The supporting text advises that the policy focuses on ensuring that biodiversity enhancements are achieved through new development, whether this is via the mandatory 10% biodiversity net gain (BNG) requirement or through smaller interventions implemented as part of small-scale proposals, such as householder extensions. In the case of BNG, the policy prioritises its delivery on-site rather than off-site and, where off-site is necessary,

opportunities should in the first instance be sought at sites elsewhere in the neighbourhood area.

- 7.59 The policy has four main elements. The first advises that the hierarchy of mitigation should be embedded into the design of the development. The second comments that if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated or, as a last resort, compensated for, then planning permission will be refused. The third comments that development proposals will be required to demonstrate measurable net biodiversity gain, equivalent to a minimum 10% increase, and this should be achieved on site wherever possible and in accordance with BS8683:2021 Process for designing and implementing biodiversity net gain (BNG). The fourth comments that where off-site BNG is necessary, opportunities to deliver this within the neighbourhood area should be considered before looking at opportunities in the wider local area.
- 7.60 In general terms the policy takes a positive approach and has regards to Section 15 of the NPPF. It incorporates the national requirement for BNG and the fourth section identifies important local areas for the delivery of BNG. I have carefully noted the comments from the development industry on the policy. Taking account of all the relevant comments, I recommend the following package of modifications to ensure that the policy meets the basic conditions and to allow SCDC to be able to apply its contents in a consistent way through the development management process:
- using language more relevant to a neighbourhood plan in the second and third parts of the policy;
 - making proper reference to the neighbourhood area in the fourth part of the policy and revising the reference to the unspecified 'wider local area'; and
 - revising the emphasis in the fifth part of the policy from a requirement to one which supports the integration of biodiversity measures within a building
- 7.61 I have noted the detailed comments from the Swifts Local Network. Whilst they would add value to the submitted policy, they are not required to ensure that the policy meets the basic conditions.
- 7.62 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the second part of the policy with: 'Where significant harm to biodiversity resulting from a development proposal cannot be avoided, adequately mitigated or, as a last resort, compensated for, the proposal will not be supported.'

In the third part of the policy replace ‘Development proposals will be required’ to ‘Development proposals should’

Replace the opening element of the fourth part of the policy with: ‘Where off-site BNG is necessary, opportunities for delivery within the neighbourhood area should be considered before looking at opportunities elsewhere. Appropriate measures for delivering BNG in the neighbourhood area include:’

Replace the fifth part of the policy with: ‘Development proposals, including those which are exempt from BNG requirements, such as householder extensions which take opportunities to integrate biodiversity measures within a building through the provision of integrated bird boxes (such as swift bricks), bat boxes, and hedgehog highways will be supported.’

Policy S&GS 11 Trees and development

- 7.63 This policy seeks to protect trees and hedges during construction. It also seeks to ensure that developers provide for their future maintenance.
- 7.64 The policy comments that all trees and hedgerows of good arboricultural value 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. It also comments about replacement trees and arrangements for the future maintenance of new trees and hedgerows.
- 7.65 In general the policy takes a positive approach to this matter and has regard to Section 15 of the NPPF. Nevertheless, I recommend that the first part of the policy is deleted and repositioned into the supporting text given that its focus is on the details to be submitted with planning applications.
- 7.66 The second part of the policy addresses a series of overlapping issues. I recommend that they are identified as principles and presented as bullet points so that each element can be more easily be applied to individual development proposals. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Delete the first part of the policy.

Replace the second part of the policy with:

‘Proposals which would affect existing trees and hedgerows, or which include the introduction of new trees and hedgerows should respond positively to the following principles:

- 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 planted at a suitable size to compensate for the removed trees; and
- new tree and hedgerow planting should prioritise species which enhance biodiversity (native planting and/or species capable of adapting to the changing climate).'

At the end of 7.67 add:

'As appropriate to their scale and nature, planning applications for a development site where trees are present and at risk of being impacted by the proposed development, should be accompanied by:

- *a tree survey as outlined in BS 5837 2012 (or its equivalent replacement). This also includes any hedges on site and any adjacent trees to the site which may be affected by the proposed development; and*
- *an arboricultural impact assessment and a tree protection plan showing how trees and hedges are to be protected and sustained during the construction process.'*

Policy S&GS 12 Protecting Stapleford and Great Shelford's landscape character

- 7.67 The supporting text advises that the Plan is underpinned by the 'Stapleford and Great Shelford Landscape Character Assessment 2019' (LCA) which includes detailed planning and land management guidance for a series of unbuilt zones across the neighbourhood area. It also advises that development proposals must be sensitive to this guidance, minimising their impact on the landscape, protecting or enhancing valued features, and retaining the existing area of separation between Stapleford and Great Shelford and the City of Cambridge.
- 7.68 The policy has three related parts. The first comments that all development proposals shall be sensitive to the distinctive landscape and settlement character of the neighbourhood area. The second comments that where otherwise acceptable, any major and strategic development proposal resulting in the expansion of the City of Cambridge into the neighbourhood area must

incorporate landscape mitigation measures to protect and enhance the landscape setting of the two villages, including where applicable a significant protected strategic landscape gap. The third comments that where potential adverse impacts on Stapleford and Great Shelford's landscape and settlement character are identified, proposals should demonstrate that they have been informed by an assessment of landscape and visual impacts (proportionate to the scheme proposed) and that a series of matters are addressed.

7.69 I looked at the parcels of land addressed in the policy as best I could during the visit. I saw the sensitive relationship between the built-up parts of the neighbourhood area and Cambridge to the north.

7.70 The policy has generated a series of comments which are summarised below:

Ten Acres – very specific comments on one parcel of land

Cambridgeshire County Council:

- Criteria 1(b) of this policy seeks to retain the existing area of separation between Stapleford and Great Shelford and the City of Cambridge. Criteria 4 of this policy refers to development affecting the proposed Landscape Improvement Area in Policy S&GS 21. In summary, these criteria do not take into account the allocation for an extension to Cambridge Biomedical Campus in the adopted South Cambridgeshire Local Plan, that all of the land between the villages and Cambridge is already designated as Green Belt, or that a Countryside Enhancement Strategy is identified in the adopted Cambridge Southern Fringe AAP.
- Policy S/4 of the adopted South Cambridgeshire Local Plan seeks to maintain a Green Belt around Cambridge, with any development proposals in the Green Belt assessed against national policies contained in the NPPF. The Green Belt at Great Shelford and Stapleford is defined on the Local Plan Proposals Map Inset No.45

Cambridge Past, Present and Future – support the policy

Axis Land Partnerships:

- Criteria 1(b) of this policy seeks to retain the existing area of separation between Stapleford and Great Shelford and the City of Cambridge. Criteria 4 of this policy refers to development affecting the proposed Landscape Improvement Area in Policy S&GS 21. In summary, these criteria do not take into account that all the land between the villages and Cambridge is already designated as Green Belt, or that a Countryside Enhancement Strategy is identified in the adopted Cambridge Southern Fringe AAP.
- Criteria 1(b) of Policy S&GS 12 would duplicate the openness requirement of the Green Belt designation that already applies to land

between the villages and Cambridge, and landscape character is already protected by Policy NH/2 of the adopted Local Plan. It is not necessary to duplicate development plan policies and national policies, and to do so would be inconsistent with Paragraph 16(f) of the NPPF. Therefore, criteria 1(b) of the policy would not meet Basic Condition (a). In addition, it is not clear what is meant by the term “existing area of separation” between the villages and Cambridge, as it is not defined in the Plan

SCDC - The policy could be open to interpretation and it was therefore suggested that the wording be changed from ‘be sympathetic to the characteristics’ to read ‘be in accordance with the characteristics’

7.71 I have considered the policy and the various representations very carefully, alongside SPC’s responses to the clarification note. On the one hand it is properly underpinned by the LCA and seeks to capture the separation between the villages and Cambridge to the north. On the other hand, some of its commentary shifts from landscape character into strategic planning matters. In this broader context I recommend the following modifications to bring the clarity required by the NPPF:

- the introduction of a proportionate element into the first part of the policy. This will recognise that most minor and domestic proposals will not trigger the various elements of the policy;
- the replacement of part 1b with more general commentary about the separation of the villages from Cambridge rather than making a strategic comment on future development in this area (which is a matter for the emerging Local Plan);
- Detailed changes to the wording of part 1c (as proposed by SCDC);
- The deletion of the second part of the policy which comments about development proposals which it acknowledges would be contrary to the strategic policies in the development plan (and associated modifications to the supporting text);
- the deletion of a sentence in part 3b of the policy to ensure consistency with the recommended modification to Policy S&GS 13 later in this report); and
- the deletion of the fourth part of the policy and its relocation into the text. This acknowledges that it comments about the overlap between two policies rather than being a land use policy in its own right

7.72 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the opening sentence of the first part of the policy with: ‘As appropriate to their scale, nature and location, development proposals

should be sensitive to the distinctive landscape and settlement character of the neighbourhood area.'

Replace 1b with: 'respect the identity of Stapleford and Great Shelford as two villages distinct and separate from the City of Cambridge'

In 1c replace 'be sympathetic to the characteristics' with 'be in accordance with the characteristics'

Delete the second part of the policy (and the associated Note 1).

In 3b delete 'For edge of settlement locations, account must be taken of important views from the countryside (see Policy S&GS 13).'

Delete the fourth part of the policy

At the end of paragraph 8.9 add: 'Policy S&GS12 is a self-contained policy. Proposals within or otherwise affecting the Stapleford and Great Shelford Improved Landscape Area should also comply with Policy S&GS 21 of the Plan.'

Delete paragraph 8.15 (and its heading)

Policy S&GS 13 Important views

- 7.73 Views and vistas which are highly valued by the community are identified for protection or enhancement. The supporting text advises that 25 views were initially mapped as part of the LCA, and that further views were also described in the detailed text of that report. As part of preparing the Plan all the views have been re-appraised and included as part of the community engagement work. The outcome is the identification of 29 views, as listed in the policy. A description of each view, including an explanation of key features to be protected or enhanced, is provided in Appendix 7.
- 7.74 The policy comments that development proposals must maintain or enhance the key features and the setting of the views into and out of the settlement area. It also comments that development proposals which have an impact on views must be supported by a Landscape and Visual Impact Assessment or a Landscape and Visual Appraisal.
- 7.75 I looked at a selection of the proposed views during the visit.
- 7.76 The policy has attracted a range of representations as follows:
- SCDC
- views Aa and Bb which are already part of the adopted Cambridge Local Plan 2018 (Appendix F) do not need to be unnecessarily duplicated in the Plan;

- the Plan only applies to the neighbourhood area and cannot be used when making decisions elsewhere;
- the policy includes a list of 29 views that will be onerous for the decision-maker to assess when determining planning applications. Given the quantity of important views identified and the panoramic nature of several of the views, we would query whether all views identified are important enough to warrant designation. Appendix 7 describes the 'key contributing features to sense of place' of each important view, rather than the specific key or significant features that are the focus of the view;
- the key contributing features identified for many views include locally ubiquitous features such as a strong sense of countryside and tranquillity, and the adopted Local Plan Policy NH/2 already seeks to ensure that local landscape character is respected, retained, and enhanced;
- the relatively low threshold for designation has resulted in effectively all land to the north, west and east of the built-up area of the villages being included within the frame of a proposed important view, and therefore we question whether this policy meets the basic conditions of having regard to national policies and contributing to the achievement of sustainable development; and
- view S is along one of the proposed access points towards the proposed allocation (S/RSC/HW Land between Hinton Way and Mingle Lane, Great Shelford) in the Greater Cambridge Local Plan First Proposals Regulation 18 consultation.

Axis Land Partnerships

- there is no clear methodology has been provided with the policy as to how the Important Views have been identified and what, if any, qualities they need to have to qualify. There is no public footpath or bridleway across the land off Hinton Way, and there are no public footpaths or bridleways within the proposed important views at Views O, S, T and U;
- the proposed important views at Views O, S, T and U do not take into account the changes to landscape and visual character that are taking place as a result of the retirement village development and associated countryside park at land of Haverhill Road, which is currently under construction; and
- the proposed important views at Views O, S, T and U do not take into account the future potential changes to landscape and visual character that are likely to arise from the Cambridge South East Transport project (a new busway to the east of Stapleford with stops at Haverhill Road and Hinton Way), or the draft allocation for residential development off

Mingle Lane in the emerging Greater Cambridge Local Plan (draft Policy S/RSC/HW for 100 dwellings).

Cambridgeshire County Council

- advises that it owns two parcels of land within the proposed important views. One parcel of land is allocated in the adopted South Cambridgeshire Local Plan for an extension to Cambridge Biomedical Campus (Policy E/2). The second parcel of land is identified as a preferred allocation for an additional extension to the Campus in the emerging Greater Cambridge Local Plan (Policy S/CBC). These two parcels of land fall within View K (DNA Path next to bridge over railway) and View P (High point on Granhams Road). In summary, it is considered that proposed View K and View P are general views of the countryside only, do not contain any particularly notable landscape or topographic features, and the assessment of those views does not explain why those views are important to warrant special protection. There are other adopted development plan policies that would ensure the delivery of appropriate landscaping with development; and
- Appendix 7 of the Plan describes the proposed important views at View K and View P, and seeks to explain why those views should be protected. The photographs of View K and View P show a typical view of the countryside at these locations, containing agricultural land, hedgerows and trees, and areas of woodland.

East West Rail - The construction of the railway line will result in a temporary disruption to some of the views

Nightingale Land - it will be difficult for a decision maker to apply this policy consistently and with ease. For instance, the views referred to above are not clearly defined on Map 7. In addition, there is no need to reference the need to a LVIA as this is already set out in the Local Validation Checklist and applicants will be required to submit this evidence, when necessary, in any event.

- 7.77 I have considered the policy and the comments carefully. On the one hand, the identified views reflect the broader work undertaken as part of the Landscape Character Assessment 2019 (LCA) and as underpinned by public consultation and engagement.
- 7.78 However, on the other hand, the focus of the LCA is on landscape character rather than views. In addition, it does not comment in any detail about the way in which the views have been identified and the extent to which they are sufficiently important to warrant such an approach. Similarly, many of the views are general in nature and overlap with the broader protection afforded

by the Green Belt. As SCDC comment, the relatively low threshold for designation has resulted in effectively all land to the north, west and east of the built-up area of the two villages being included within the frame of a proposed important view

- 7.79 In its response to the clarification note, SPC reassessed the views. It proposed the retention of the landscape and visual value of views in Categories 1 and 2 (that they are 'highly important' or 'important') and propose to remove ten views of lower landscape and visual value from the policy.
- 7.80 I have noted SPC's proposal to reduce the number of views and its broader comments on the purpose of the policy. However, based on all the evidence I recommend that the policy and the supporting text are deleted. The information contained in the LCA is limited to a description of the various views and does include an assessment of their importance within the wider landscape. In several cases, the identified views are of a general rather than a specific nature. As such they do not necessarily identify specific aspects of the relationship between the village and the surrounding countryside which might otherwise justify the preparation of a policy of this type.

Delete the policy

Delete paragraphs 8.16 to 8.20

Delete Map 7

Policy S&GS 14 Important Countryside Frontages

- 7.81 The supporting text comments that Important Countryside Frontages (ICFs) enhance the setting, character, and appearance of the neighbourhood area by retaining a sense of connection between the villages and their rural origins and surroundings. It advises that the identified Frontages and countryside beyond should be kept open and free from development. The Plan advises that two Frontages are identified in Great Shelford in the Local Plan, and the policy proposes three additional Frontages in Stapleford.
- 7.82 The policy comments that three areas shown on Map 8 are identified as Important Countryside Frontages where land has a strong countryside character because it either penetrates or sweeps into the built-up area and provides a significant connection between the street scene and the surrounding rural area, or provides an important rural break between two nearby but detached parts of the development framework. It also comments that where a development proposal compromises these purposes, planning permission will be refused.
- 7.83 I looked at the proposed ICFs during the visit.

- 7.84 I have noted the comments received from Nightingale Land and SCDC, and SPC's responses to the clarification note. On this basis I recommend the deletion of the proposed ICF B (land at Mingle Lane), its deletion from Map 8, and consequential modifications to the supporting text.
- 7.85 I have considered carefully the comments from SCDC on the other two proposed ICFs and SPC's responses to the clarification note. Plainly there are judgements to be made about the extent to which the proposals meet the criteria for such designations as highlighted in the Local Plan. On the balance of the evidence, I have concluded that
- proposed ICF A (Gog Magog Way) meets the criteria for such designations given that it penetrates or sweeps into the built-up area, providing a significant connection to the rural area; and
 - proposed ICF C (Haverhill Road) does not meet the criteria for such designations given that it is on the edge of the built-up area and does not meet either of the two local criteria for such designations
- 7.86 On this basis I recommend the deletion of the proposed ICF C (land east of Haverhill Road), its deletion from Map 8 and consequential modifications to the supporting text.
- 7.87 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace 'The areas shown on Map 8 are identified as Important Countryside Frontages' with 'The area shown on Map 8 is identified as an Important Countryside Frontage'

Delete ICFs B and C

Delete ICFs B and C from Map 8

In 8.25 replace 'three additional ICFs' with 'an additional ICF' and sections b) and c)

Policy S&GS 15 Local Green Spaces and Protected Village Amenity Area

- 7.88 The Plan proposes the designation of eight sites as Local Green Spaces (LGS) and one new site as a Protected Village Amenity Area (PVAA). The proposed designation of the LGSs is underpinned by a separate (and comprehensive) Assessment. Details of each LGS are also included in the supporting text. The proposed PVAA will complement those in the neighbourhood area already identified in the adopted Local Plan.
- 7.89 Comments on the proposed designation of LGS3 (the Horse Pasture) and LGS7 (the Stapleford allotments) were received from St John's College

Cambridge and the Ely Diocesan Board of Finance respectively. I address these matters separately.

LGS3: Horse pasture bounded by Granhams Road, the DNA path and Macaulay Avenue housing, Great Shelford

- 7.90 The proposed LGS is a horse pasture on the northern edge of Great Shelford. St John's College agrees that the proposed LGS meets two of the three tests for LGS designation in paragraph 106 of the NPPF. However, it argues that SPC's language in the LGS Assessment advise that the site is 'of value' but does not identify that the Horse Pasture is demonstrably special to a local community and holds a particular local significance.
- 7.91 I looked at the proposed LGS carefully during the visit and have considered these different views about the extent to which it meets the criteria for such designations. On the balance of the evidence, I am not satisfied that the proposed LGS is demonstrably special to the local community and holds a particular significance. It is a horse pasture which is readily found in the countryside on the edge of villages and, in this case, does not have any of the special features readily displayed by the other proposed LGSs. As such I recommend its deletion from the policy and consequential modifications to the supporting text and to Map 9.

LGS7 Stapleford allotments

- 7.92 The proposed LGS consists of the allotments in Stapleford. Ely Diocesan Board of Finance (EDBF) objects to the proposed designation on the basis that the land is already designated as Green Belt and it is not necessary to duplicate policy designations that have an identical status. In its response to the clarification note SPC commented 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.'*
- 7.93 I looked at the proposed LGS carefully during the visit and have considered these different interpretations of its importance. Setting aside the Green Belt issue, I am satisfied that the allotments meet each of the three criteria in paragraph 106 of the NPPF. I saw first-hand during the visit the way in which they were being tended by the allotment holders. I am also satisfied that they meet the criteria in paragraph 105 of the NPPF. The allotments contribute to the local delivery of sustainable development and there is no evidence

available to suggest that they will not endure beyond the end of the Plan period.

- 7.94 Planning practice guidance (ID: 37-010-20140306) advises that consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space where the land concerned is already protected by green belt policy. Whilst this was not carried out in the LGS Assessment, SPC has commented in its response to the clarification note that the effects of a LGS policy and Green Belt policy are largely identical. Nevertheless, there are different reasons for designating a LGS and the incorporation of land within the Green Belt. On the balance of the evidence, I am satisfied that SPC has presented a robust case for the proposed designation of the allotments as a LGS.

The other proposed LGS

- 7.95 I looked at the other proposed LGSs carefully during the visit. I saw their different sizes and land uses. I noted the wider community significance (and popularity) of the two recreation grounds (LGS 2 and LGS8). I am satisfied that all of the other proposed LGSs comply with the criteria in paragraphs 105 and 106 of the NPPF and therefore meet the basic conditions.
- 7.96 The policy advises that development proposals on the proposed LGSs will only be supported in very special circumstances. This follows the approach taken in paragraph 107 of the NPPF and meets the basic conditions.
- 7.97 I also looked carefully at the proposed Protected Village Amenity Area (PVAA). I am satisfied that the approach taken towards the site is appropriate and sufficiently different to that proposed for the LGSs. However, I recommend that this part of the policy is simplified given that only one PVAA is proposed in the Plan.
- 7.98 On the balance of the evidence I am satisfied that it is appropriate for the LGS and the PVAA elements of the policy to be included in the same policy. Whilst LGSs have a particular significance in national legislation, the policy makes a clear distinction between the two local designations.
- 7.99 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

In the first part of the policy delete LGS3.

Replace the second part of the policy with:

‘Land owned by Stapleford Parish Council behind the Slaughterhouse, Church Street (as shown on Policy Map 10) is designated as a Protected Village Amenity Area in accordance with South Cambridgeshire’s 2018 Local Plan Policy NH/11 (or its equivalent replacement).’

In the supporting text delete the section on LGS 3 and Image 5, and amend the number of LGSs referenced in paragraph 8.26 of the Plan.

Remove LGS3 from Map 9 (and its key).

Policy S&GS 16 Preserving our dark landscape

- 7.100 The supporting text advises that light pollution obscures the night sky and is harmful to wildlife and natural rhythms. The policy aims to minimise light pollution from any new development in the neighbourhood area.
- 7.101 The policy comments that development proposals which include external lighting will only be permitted if the night sky is protected from light pollution and sensitive habitats are protected from harm. It also includes other more detailed elements in its second part.
- 7.102 I recommend a series of modifications to the policy and the supporting text to respond to the representations received and to bring the clarity required by the NPPF. They do not alter its overall effect. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the first part of the policy with: ‘Development proposals which include external lighting should ensure that the night sky is protected from light pollution and that sensitive habitats are protected from harm.’

Replace the opening element of the third part of the policy with: ‘To protect sensitive habitats, this means that any external lighting should not be installed on or spill into or otherwise impact sensitive sites such as the river, the SSSIs, the Local Nature Reserves, County Wildlife Sites, the Clay Pit or the chalk streams unless:’

At the end of paragraph 8.38 add: ‘The policy has been worded to apply to development proposals which require planning permission. In most cases the installation of domestic lighting is permitted development.’

Policy S&GS 17 Delivering community infrastructure priorities alongside new development

- 7.103 The supporting text comments that development must address the increased demands it will place on, and existing shortfalls in, our community’s amenity and infrastructure needs, specifically in healthcare, primary school education, transport, open spaces and play spaces. The supporting text to the policy

highlights where shortfalls or potential issues in infrastructure are known to exist.

- 7.104 The policy has three related parts. The first comments that all development proposals should contribute towards infrastructure priorities where it is necessary to make the development acceptable and where directly, fairly, and reasonably related in scale and kind to the development. The second advises that the provision of new and improved community infrastructure will depend on the location and specific impacts of individual development proposals, and should take account of the changing infrastructure needs of our ageing population as well as the following local priorities. The third comments that development proposals will not be supported where the community infrastructure necessary (such as sufficient capacity at primary schools) to support the development is not in place or planned to be provided as part of the development proposals.
- 7.105 In general terms the policy takes a positive approach to community infrastructure and has regard to Sections 8 and 12 of the NPPF.
- 7.106 Axis Land Partnerships comments that part c of the policy is inconsistent with regulations, national policy, and development plan policy, in respect of pooled and off-site contributions, and should be deleted. It also comments that the overall policy would be ineffective at delivering community infrastructure in the absence of development or specific policy support for additional development and that the identified needs for informal open space and play space would remain undelivered.
- 7.107 I have considered these comments along with other comments from SCDC, a local interest group and other developers. I recommend the following modifications to bring the clarity required by the NPPF and to allow SCDC to be able to apply the policy consistency through the development management system:
- the introduction of a proportionate element into the first part of the policy;
 - a recasting of the wording in the second part of the policy so that it explains its ambitions in a clearer way; and
 - the deletion of the third part of the policy – it is the reverse of the first part of the policy and fails to acknowledge the potential for pooled and/or off-site contributions to community infrastructure
- 7.108 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Replace the first part of the policy with: ‘As appropriate to their scale, nature, and location, development proposals should contribute towards infrastructure priorities where it is necessary to make the development

acceptable and where directly, fairly, and reasonably related in scale and kind to the development.'

In the second part of the policy replace 'and should take account of the changing infrastructure needs of our ageing population as well as the following local priorities:' with 'and should respond positively to the needs of our ageing population as well as the following local infrastructure priorities:'

Delete the third part of the policy.

Policy S&GS 18 Facilitating active travel in Stapleford and Great Shelford

- 7.109 The Plan comments that it wants to make it safer and easier for people travelling in or through the neighbourhood area to choose active travel modes, reducing reliance on private cars and hence also traffic congestion. It advises that development proposals are expected to incorporate active travel within their sites and connect to the existing network. It also comments that when appropriate, they should also contribute towards new and/or upgrade existing routes in the neighbourhood area. In this respect, the Plan identifies five active travel priorities.
- 7.110 The policy has two main parts. The first comments that all development proposals will be expected to incorporate safe and attractive walking and cycling routes on site (as appropriate and proportionate to the nature and scale of the proposed development) and take opportunities to connect to the wider public rights of way, walking and cycling routes in the neighbourhood area. The second comments that where development proposals generate new movement of residents, workers, shoppers, etc, they will also be expected to take every available opportunity to improve connectivity across the wider neighbourhood through the provision of or through contributions towards improved or new active travel links or active travel infrastructure.
- 7.111 In general terms the policy takes a positive approach to this issue and which reflects several of the broader ambitions of the Plan. I note the detailed comments made by SCDC about the way in which the policy would be applied and the different impacts and opportunities that would arise with individual development proposals. In this context, I recommend the following package of recommended modifications to bring the clarity required by the NPPF and to allow SCDC to be able to apply the policy through the development management process:
- the introduction of clarity around the need for proportionality in the first and second parts of the policy;
 - the repositioning of explanatory information from the first part of the policy into the supporting text; and

- greater clarity on the way in which the third part of the policy would apply to proposals which failed to take reasonable and practicable opportunities to provide new connections between residential areas and shops and services (including schools).

7.112 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the first part of the policy with:

‘As appropriate to their scale, nature and location, development proposals should incorporate safe and attractive walking and cycling routes on site and take opportunities to connect to the wider public rights of way, walking and cycling routes in the neighbourhood area. Development proposals should also respond positively to Design code CN.02 Connected Streets (in the S&GS Design Guidance & Codes 2023).’

Replace the second part of the policy with:

‘As appropriate to their scale, nature and location, development proposals should take every available opportunity to improve connectivity throughout the neighbourhood area through the provision of or through contributions towards improved or new active travel links or active travel infrastructure. Where appropriate, the active travel projects shown on Map 11 and described in the supporting text to the policy should be prioritised for such connectivity.’

In the third part of the policy replace ‘fail to utilise opportunities’ with ‘fail to take reasonable and practicable opportunities’

At the end of paragraph 10.10 add ‘Policy S&GS 18 sets out the Plan’s approach towards facilitating active travel in Stapleford and Great Shelford. The second part of the policy comments about opportunities for developer contributions. Any such planning obligations would need to meet the national tests set out in paragraph 57 of the NPPF 2023.’

Policy S&GS 19 Managing the impacts of new development in the Plan area with respect to the movement of people and vehicles

7.113 This policy defines how the traffic implications of major development schemes should be assessed in planning proposals.

7.114 The policy comments that proposals for major development that are likely to trigger significant traffic movements will be required to be supported by highways information including, where applicable, a transport assessment which predicts the level and impact of increased traffic movements during both the construction and operation phases. It also comments that all

development proposals which are likely to exacerbate existing problems relating to traffic volumes and traffic congestion (i.e. by generating noticeable increases in traffic movements or by increasing demand for on-street parking or causing obstructions to flowing traffic) will be expected to be accompanied by local highways and environmental information which details a series of matters.

7.115 SCDC and Axis Land Partnerships raise a series of operational issues about the policy. Where appropriate, I have incorporated them within the following recommended modifications to bring the clarity required by the NPPF:

- the inclusion of a proportionate element within a recast third part of the policy; and
- the separation of policy from supporting text in the fifth part of the policy.

7.116 I also recommend a modification to the title of the policy so that it uses the proper title of the neighbourhood area. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the opening element of the third part of the policy with:

‘As appropriate to their scale, nature and location, development proposals which would exacerbate existing problems relating to traffic volumes and traffic congestion (i.e. by generating noticeable increases in traffic movements or by increasing demand for on-street parking or causing obstructions to flowing traffic) in the neighbourhood area should be accompanied by local highways and environmental information which details:’

Replace the fifth part of the policy with:

‘Proposals which are designed to lead to an overall reduction in traffic volume and/or traffic congestion along the A1301/in the Great Shelford civic core, and which comply with other development plan policies will be supported.’

At the end of 10.46 add: ‘The fifth part of the policy offers support to proposals which are designed to lead to an overall reduction in traffic volume and/or traffic congestion along the A1301/in the Great Shelford civic core. This could include the delivery of off-street parking provision designed to meet demand generated by visitors to village shops, services and other amenities and helping towards the implementation of the active travel priorities listed in Policy S&GS 18.’

In the policy title replace ‘plan area’ with ‘neighbourhood area’

Policy S&GS 20 Protecting and improving routes into our countryside

- 7.117 The supporting text advises that the community recognises the lack of public access to it in general and of interconnected off-road routes in particular. The policy protects rights of way and requires that, where appropriate, new development improves the network with new routes and linkages. The Plan identifies a set of priorities for this approach.
- 7.118 The resulting policy is extensive and sets out a series of requirements for development proposals.
- 7.119 I have noted the various representations made on the policy. Based on the contents of Sections 9 and 10 of the NPPF I recommend the following series of modifications to ensure that the policy has regard to national policy and can be applied by SCDC in a consistent way:
- the inclusion of a proportionate element in the second part of the policy;
 - technical changes to the third part of the policy;
 - the simplification of the fourth and fifth parts of the policy; and
 - the relocation of the sixth part of the policy into the supporting text to acknowledge that it describes how improvements should be considered rather than operating as a land use policy,
- 7.120 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the second part of the policy with: ‘As appropriate to their scale, nature, and location, development proposals should take any reasonable opportunities to create new links, including bridleways, into the existing public rights of way network, to upgrade existing permissive paths into public rights of way, or to improve the quality of provision in the existing network. The Plan’s aspirations for new routes are shown on Map 13.’

In the third part of the policy replace ‘must also form part of the consent process’ with ‘should form part of the overall package’

Replace the fourth part of the policy with: ‘Where appropriate, proposals for major residential development should either provide improvements to the network of public access routes into the open countryside or make financial contributions towards such improvements.’

Replace the fifth part of the policy with: ‘Development proposals which would result in a reduction in the quality or quantity of rural routes accessible to non-motorised users will not be supported.’

Delete the sixth part of the policy.

At the end of paragraph 11.20 add: ‘Where improvements are being agreed as part of complying with Policy S&GS20, regard shall be had to the needs and safety of all non-motorised users of the network.’

Policy S&GS 21 Stapleford and Great Shelford’s Improved Landscape Area

- 7.121 The supporting text comments that an area of land between the villages and the City of Cambridge is identified in the Plan as the Stapleford and Great Shelford Improved Landscape Area. It also advises that this area aligns with that identified in South Cambridgeshire’s 2018 Local Plan as the CSF/5 Countryside Enhancement Area.
- 7.122 The policy has two related parts The first comments that for development proposals coming forward in or otherwise impacting upon the Stapleford and Great Shelford Improved Landscape Area, opportunities will be sought to implement the countryside enhancement measures described in the supporting text and shown on Map 14. The second comments that where necessary to protect and enhance the landscape setting of both the rural villages and the historic City of Cambridge and where directly, fairly, and reasonably related in scale and kind to the development, financial contributions towards these initiatives will be sought.
- 7.123 The supporting text helpfully explains the way in which the policy has been developed. It advises that the Southern Fringe Area Action Plan (2008) includes Policy CSF/5: Countryside Enhancement Strategy, which commits SCDC to prepare a Countryside Enhancement Strategy for the area bounded by the Cambridge City boundary, Babraham Road, Haverhill Road, and the edge of the built-up area of Great Shelford and Stapleford. The Plan also advises that the required Countryside Enhancement Strategy has not been progressed since the adoption of the Area Action Plan. It then advises that as the two parish councils were initially progressing work on the Plan, a Landscape Character Assessment was commissioned. The LCA (published in 2019) included recommendations with respect to a Countryside Enhancement Strategy for the area of land concerned.
- 7.124 The supporting text identifies that the identified improvements are consistent with other ongoing initiatives in the wider area, including the Cambridge Nature Network 2021. It also comments that whilst considerable work has gone into identifying the initiatives, the areas of land are, at this stage, identified as potentially suitable for enhancement and that the exact nature and scale of potential enhancements would be subject to site studies and collaboration between stakeholders (landowners, parish councils, statutory bodies).

7.125 The supporting text also acknowledges that the delivery of the improvements could happen outside the planning process via community-led initiatives. They could also be delivered through the planning process if a specific proposal comes forward and presents a new opportunity. Alternatively, improvements could be required as a condition of granting planning consent; this would apply where the improvements are necessary to mitigate specific adverse impacts of a development scheme. Paragraph 11.32 of the Plan sets out eight proposed improvements.

7.126 I looked at the area affected by the proposed Improved Landscape Area during the visit.

7.127 The policy has attracted a range of comments. In summary they are as follows:

St John's College Cambridge - support

Nightingale Land – Question how the policy approach would be delivered. Rather than stipulate specific measures which are currently outside the neighbourhood plan's control it would be best if this policy was modified so that it ensures development within this location seeks to support the delivery of new biodiversity features within the neighbourhood plan area where necessary.

East West Rail – raise issues over delivery and implementation of route

Axis Land Partnerships

- Policy CSF/5 of the adopted Cambridge Southern Fringe AAP, which is part of the adopted development plan for South Cambridgeshire, already designates the same land for a countryside enhancement strategy. The land designated by Policy CSF/5 is shown on Inset E of the adopted AAP. Policy CSF/5 provides additional detail of the landscape, planting and access measures required. The countryside enhancement strategy proposed in the adopted AAP are linked to and funded by development. There are no development allocations in draft S&GSNP that would support the delivery of the proposed Improved Landscape Area in Policy S&GS 21, and without an effective delivery mechanism this proposed designation would not be implemented. The fact that the proposed Improved Landscape Area is unrelated to development and contains no delivery mechanism makes it inconsistent with Policy CSF/5 in the adopted Cambridge Southern Fringe AAP.
- The second paragraph of Policy S&GS 21 requires planning obligations for landscape initiatives listed in Paragraph 11.32. Most of the listed landscape improvements are located on private land, and some are related to specific development proposals. It is not clear whether there

is landowner agreement for these landscape improvements, and how they would be delivered on private land that is unrelated to a particular development. The landscape improvements for a particular development should be determined in a site-specific policy for an allocation and at planning application stage, and contributions should not be sought for potentially unrelated landscape projects. The second paragraph of the policy is not consistent with national policy on planning obligations contained in Paragraph 57 of the NPPF.

Cambridgeshire County Council (Strategic Assets) – the policy is not in general conformity with and undermines the allocation for an extension to Cambridge Biomedical Campus in Policy E/2 of the adopted South Cambridgeshire Local Plan, and the land included within this proposed designation is already identified as an area for a Countryside Enhancement Strategy under Policy CSF/5 of the adopted Cambridge Southern Fringe AAP which remains part of the development plan and should not be duplicated.

SCDC - comments on the details and the implementation of the policy.

7.128 I have considered the policy very carefully. By way of context, the Cambridge Southern Fringe Area Action Plan remains part of the development plan, and Policy CSF/5 of that Plan is a strategic policy. In these circumstances I am satisfied that the proposed policy is in general conformity with the strategic policies in the development plan.

7.129 The Plan acknowledges the overlaps between the proposed policy and the approach taken in Policy CSF/5 of the adopted Area Action Plan. In general terms it would be inappropriate for a neighbourhood plan to repeat or to restate existing development plan policies. However, in this case I am satisfied that the policy fulfils two roles. In the first instance it develops and provides a delivery mechanism for the Cambridge Southern Fringe AAP/Improved Landscape Area which has not otherwise come forward. In the second instance, it proposes eight improvements either for more general local delivery or through the development management process.

7.130 I sought clarification from SPC on a series of issues in the clarification note. The first was the extent to which the parish councils considered the overlap between the submitted policy and Policy CSF/5 of the adopted Cambridge Southern Fringe. In its response SPC advised as follows:

‘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.

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.'

- 7.131 The second was the extent to which the first part of the policy requires that developers proactively look to take opportunities to implement the countryside enhancement measures described in the supporting text of the policy. In its response to the clarification note SPC advised that:

'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.'

- 7.132 The third was the extent to which SCDC would be able to determine the extent to which those opportunities had been pursued. There was no specific response to this question.

- 7.133 The fourth was the extent to which the policy should acknowledge that a developer will usually be able to secure countryside enhancement measures only within the application site. In its response to the clarification note, SPC advised that:

'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.'

- 7.134 Within this broader context I recommend the following package of modifications to the policy and the supporting text:

- the identification of the Improved Landscape Area on a separate map – as submitted the Plan relies on the definition of the Countryside Enhancement Strategy (in the AAP) and which is shown more generally on Map 2;
- revisions to the wording of the first and second parts of the policy – as submitted the wording does not comfortably relate to the implementation of the development management system; and

- the exclusion of the area allocated for an extension to Cambridge Biomedical Campus in Policy E/2 of the adopted South Cambridgeshire Local Plan from the Improved Landscape Area – otherwise the policy will hinder the delivery of a strategic allocation.

These modifications will bring the clarity required by the NPPF and allow SCDC to be able to apply the policy in a consistent way through the development management process.

7.135 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘The Plan identifies the Stapleford and Great Shelford’s Improved Landscape Area as shown on Map XX (insert number as appropriate)

Development proposals which may come forward in, or which would otherwise impact on the identified Stapleford and Great Shelford Improved Landscape Area, should take any reasonable opportunities to implement the countryside enhancement measures described in paragraph 11.32 of this Plan and shown on Map 14.

Where development proposals would impact on the character of the Stapleford and Great Shelford Improved Landscape Area and measures are required to protect and enhance the landscape setting of the two villages and their separation from Cambridge, financial contributions towards the delivery of any relevant initiatives in paragraph 11.32 of the Plan will be sought where they directly, fairly, and reasonably related in scale and kind to the development.’

Include a new map in the Plan showing the extent of the Stapleford and Great Shelford’s Improved Landscape Area (and which excludes the allocated extension to Cambridge Biomedical Campus in Policy E/2 of the adopted South Cambridgeshire Local Plan.

Replace paragraph 11.31 with: ‘The delivery of these improvements could happen outside the planning process via community-led initiatives. They could also be delivered through the planning process should a specific development come forward which presents a new opportunity. In most cases a developer will only be able to secure countryside enhancement measures within the application site concerned. Alternatively, improvements could be required as a condition of granting planning consent; this would apply where the improvements are necessary to mitigate specific adverse impacts of a development scheme.’

Implementation and Monitoring

- 7.136 Section 12 of the Plan addresses these matters to very good effect. It proposes mechanisms for reviewing planning applications and monitoring planning decisions. This is best practice.
- 7.137 Paragraph 12.4 advises that over time, and depending on the outcomes of the interim reviews, a full or partial review of the Plan will be considered. This is also best practice. However, within this overall context I recommend that the parish councils consider the need for a full or partial review of the Plan within 6 months of the adoption of the emerging Local Plan. This is important both generally, and given the wider growth ambitions in that Plan.

Replace paragraph 12.4 with ‘Over time, and depending on the outcomes of the interim reviews, a full or partial review of the Plan will be considered. Within this broader context the parish councils will consider the need or otherwise for a full or partial review of the Plan within six months of the adoption of the emerging Local Plan, which will provide an up-to-date planning context for both the wider District and the neighbourhood area.’

Other Matters – General

- 7.138 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for SCDC and SPC to have the flexibility to make any necessary consequential changes to the general text. This includes the replacement of ‘the plan area’ with ‘the neighbourhood area’ throughout the Plan (and beyond any specific recommended modification included in this report on a policy-by-policy basis). I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2041. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area and its relationship with Cambridge to the north.
- 8.2 Following the independent examination of the Plan, I have concluded that the Stapleford and Great Shelford Neighbourhood Development Plan meets the

basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

- 8.3 On the basis of the findings in this report, I recommend to South Cambridgeshire District Council that subject to the incorporation of the modifications set out in this report the Stapleford and Great Shelford Neighbourhood Development Plan should proceed to referendum.

Other Matters

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the District Council on 8 November 2016.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The responses to the clarification note were detailed, informative and delivered in a timely fashion.

Andrew Ashcroft
Independent Examiner
16 May 2025