200120 Comment

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Linton Parish Council
Date received: 21/08/2024 via Web

Summary:

Linton Parish Council (LPC) thank Thriplow and Heathfield NP Committee for notification of the consultation on the NP submission. LPC do not have any comments to submit for the Neighbourhood Plan.

Full text:

Linton Parish Council (LPC) thank Thriplow and Heathfield NP Committee for notification of the consultation on the NP submission. LPC do not have any comments to submit for the Neighbourhood Plan.

Attachments: None

200121 Object

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Patricia Yates
Date received: 06/08/2024 via Email

Summary:

I have read the plans for the proposed development at the grain store in Thriplow. It would appear that twenty dwellings require fifty parking spaces? The access roads would not in my opinion be capable of taking so much extra traffic in a relatively small area. Plus the small single lane connecting road not much used that ends at the base of Gravel Pit Hill would be totally blocked with traffic seeking a short cut away from the village.

Full text:

I have read the plans for the proposed development at the grain store in Thriplow.
It would appear that twenty dwellings require fifty parking spaces?
The access roads would not in my opinion be capable of taking so much extra traffic in a relatively small area. Plus the small single lane connecting road not much used that ends at the base of Gravel Pit Hill would be totally blocked with traffic seeking a short cut away from the village.

Attachments: None

200122 Comment

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Forestry Commission
Date received: 05/08/2024 via Email

Summary:

Thank you for inviting the Forestry Commission to respond to the consultation on the Neighbourhood Plan, Unfortunately we do not have the resources to respond to individual plans but we have some key points to make relevant to all neighbourhood plans.

Full text:

Thank you for inviting the Forestry Commission to respond to the consultation on the Neighbourhood Plan, Unfortunately we do not have the resources to respond to individual plans but we have some key points to make relevant to all neighbourhood plans.

Forestry Commission and Neighbourhood Planning
Existing trees in your community The Forestry Commission would like to encourage communities to review the trees and woodlands in their neighbourhood and consider whether they are sufficiently diverse in age and species to prove resilient in the face of tree pests and diseases or climate change. For example, if you have a high proportion of Ash, you are likely to see the majority suffering from Ash Dieback. Some communities are proactively planting different species straight away, to mitigate the effect of losing the Ash; you can find out more here. Alternatively, if you have a high proportion of Beech, you may find they suffer particularly from drought or flood stress as the climate becomes more extreme. There are resources available to help you get ideas for other species you can plant to diversify your tree stock and make it more resilient.

Ancient Woodland
If you have ancient woodland within or adjacent to your boundary it is important that it is considered within your plan. Ancient woodlands are irreplaceable, they have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless “there are wholly exceptional reasons and a suitable compensation strategy exists” (National Planning Policy Framework paragraph 180).

The Forestry Commission has prepared joint Standing Advice for the treatment of Ancient Woodland
If you have ancient woodland within or adjacent to your boundary it is important that it is considered within your plan. Ancient woodlands are irreplaceable, they have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless “there are wholly exceptional reasons and a suitable compensation strategy exists” (National Planning Policy Framework paragraph 180).

The Forestry Commission has prepared joint Standing Advice with Natural England on ancient woodland and veteran trees. This advice is a material consideration for planning decisions across England and can also be a useful starting point for policy considerations.
The Standing Advice explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees. It will provides links to Natural England’s Ancient Woodland Inventory and assessment guides as well as other tools to assist you in assessing potential impacts.

Deforestation

The overarching policy for the sustainable management of forests, woodland and trees in England is a presumption against deforestation.

Woodland Creation

The UK is committed in law to net zero emissions by 2050. Tree planting is recognised as contributing to efforts to tackle the biodiversity and climate emergencies we are currently facing. Neighbourhood plans are a useful mechanism for promoting tree planting close to people so that the cultural and health benefits of trees can be enjoyed alongside their broader environmental benefits. Any planting considered by the plan should require healthy resilient tree stock to minimise the risk of pests and diseases and maximise its climate change resilience, a robust management plan should also be put in place.
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affect ancient woodland. It also considers ancient wood-pasture and veteran trees. It will provides links to Natural England's Ancient Woodland Inventory and assessment guides as well as other tools to assist you in assessing potential impacts.

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Attachments: None

200123 Comment

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Sport England
Date received: 12/08/2024 via Email

Summary:

Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103.

Full text:

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process.

Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.
Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy
Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.
https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications
Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 103 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.
Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.
http://www.sportengland.org/planningtoolsandguidance
If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.
http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/
Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.
In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.
Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an

assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.
NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities
PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing
Sport England's Active Design Guidance: https://www.sportengland.org/activedesign
(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Attachments: None

200124 Comment

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Highways England
Date received: 14/08/2024 via Email

Summary:

Thank you for consulting National Highways on the abovementioned Neighbourhood Plan.

National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).

It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.

Notwithstanding the above comments, we have reviewed the document and note that the details set out within the document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.

Full text:

Thank you for consulting National Highways on the above mentioned Neighbourhood Plan.

National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).

It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.

Notwithstanding the above comments, we have reviewed the document and note that the details set out within the document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.

Attachments: None

200130 Comment

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Cambridgeshire Constabulary
Petition: 2 petitioners
Date received: 22/08/2024 via Email

Summary:

Thank you for the opportunity to comment on the “Thriplow and Heathfield Neighbourhood Plan”.

Regarding Policy - we would like to refer you to the following and recommend these are included within the revised “Thriplow and Heathfield” Neighbourhood Plan:

National Planning Policy Framework (NPPF) - Section 12 Paragraph 135 (f) which states: -

Planning policies and decisions should ensure that developments: create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

In relation to the design and layout of new developments including homes, commercial space, schools, hospitals, and sheltered accommodation we make the following comment:

Security and Crime prevention measures should be considered at the earliest opportunity as an integral part of any initial design for a proposed development. It should incorporate the principles of ‘Secured by Design’ (SBD) and demonstrate how the development proposals address the following issues, to design out and reduce the incidence and fear of crime:

• Physical protection: Places that include necessary, well-designed security features.
• Access and movement: Places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security.
• Safe routes: Creating safe routes that are as straight as possible, wide, well lit, without hiding places and well-maintained and overlooked for security and provide a sense of security for all users.
• Structure: Places that are structured so that different uses do not cause conflict.
• Lighting: Ensuring appropriate and non-obtrusive lighting levels are achieved.
• Private space: Creating a clear separation between public and private spaces, avoiding public routes next to back gardens.
• Surveillance: Places where all publicly accessible spaces are overlooked.
• Ownership: Places that promote a sense of ownership, respect, territorial responsibility, and community.
• Activity: Places where the level of human activity is appropriate to the location reduces the risk of crime and always creates a sense of safety and territoriality.
• Management and maintenance: Places that are designed with management and maintenance in mind, to discourage crime in the present and the future.

In practice this means that Secured by Design status for new developments can be achieved through careful design. Developers should, at an early stage, seek consultation and advice from the Police Designing out Crime Officers at Cambridgeshire Police Headquarters on designing out crime.

It is recommended that “Secured by Design” forms part of the conditions of any proposed planning application or re-development.

We would appreciate if the above could be taken into consideration.

Full text:

Thank you for the opportunity to comment on the “Thriplow and Heathfield Neighbourhood Plan”.

Regarding Policy - we would like to refer you to the following and recommend these are included within the revised “Thriplow and Heathfield” Neighbourhood Plan:

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In practice this means that Secured by Design status for new developments can be achieved through careful design. Developers should, at an early stage, seek consultation and advice from the Police Designing out Crime Officers at Cambridgeshire Police Headquarters on designing out crime.

It is recommended that “Secured by Design” forms part of the conditions of any proposed planning application or re-development.

We would appreciate if the above could be taken into consideration.

Attachments: None

200133 Support

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Anglian Water Services Ltd
Date received: 21/08/2024 via Email

Summary:

"Anglian Water has previously submitted comments on the pre-submission version (Reg 14) of the Thriplow and Heathfield neighbourhood plan. We welcome the amendments in the submission version of the neighbourhood plan, following our comments and recommended changes.

I can confirm, Anglian Water has no further comments to make and wish the neighbourhood plan group every success in taking this forward.

I should be grateful if you could acknowledge receipt of this representation and keep me updated on further progress made on the neighbourhood plan. "

Full text:

Anglian Water has previously submitted comments on the pre-submission version (Reg 14) of the Thriplow and Heathfield neighbourhood plan. We welcome the amendments in the submission version of the neighbourhood plan, following our comments and recommended changes.

I can confirm, Anglian Water has no further comments to make and wish the neighbourhood plan group every success in taking this forward.

I should be grateful if you could acknowledge receipt of this representation and keep me updated on further progress made on the neighbourhood plan.

Attachments: None

200134 Comment

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Historic England
Date received: 06/09/2024 via Email

Summary:

"We welcome the production of this neighbourhood plan. Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time.

We are pleased to note that our previous comments in response to Policy THP 10 have been taken into consideration.

We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

Full text:

Thank you for inviting Historic England to comment on the Regulation 16 Submission Draft of this Neighbourhood Plan.

We welcome the production of this neighbourhood plan. Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time.

We are pleased to note that our previous comments in response to Policy THP 10 have been taken into consideration.

We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

Attachments: None

200136 Support

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Dr Chris Grieco
Date received: 15/09/2024 via Web

Summary:

Living in Ringstone, Heathfield I support these plans wholeheartedly. A community centre including a shop and a pub would be fabulous. Development of local sports clubs and community groups would be wonderful. Further improvement of access via walking/cycling paths between Thriplow, Whittlesford, Foxton and within heathfield would also be terrific. I would love to help if I can, specifically with the woodland near Ringstone and hurdles way.

Full text:

Living in Ringstone, Heathfield I support these plans wholeheartedly. A community centre including a shop and a pub would be fabulous. Development of local sports clubs and community groups would be wonderful. Further improvement of access via walking/cycling paths between Thriplow, Whittlesford, Foxton and within heathfield would also be terrific. I would love to help if I can, specifically with the woodland near Ringstone and hurdles way.

Attachments: None

200137 Support

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Mr Bruce Huett
Date received: 17/09/2024 via Web

Summary:

A well constructed and comprehensive plan.

In a personal capacity and as an officer of Cam Valley Forum I am particularly interested in the environment and biodiversity, especially the water sources and streams.

It is good that the plan recognises that the very important Thriplow ecologically significant areas must be taken into account when considering planning applications.

THP 9 is good on recognising the importance of protecting water courses when development is considered as the acquifer is already depleted with an effect on flora and fauna.

The section on biodiversity net gain is good, especially the need to provide locally.

Full text:

A well constructed and comprehensive plan.

In a personal capacity and as an officer of Cam Valley Forum I am particularly interested in the environment and biodiversity, especially the water sources and streams.

It is good that the plan recognises that the very important Thriplow ecologically significant areas must be taken into account when considering planning applications.

THP 9 is good on recognising the importance of protecting water courses when development is considered as the acquifer is already depleted with an effect on flora and fauna.

The section on biodiversity net gain is good, especially the need to provide locally.

Attachments: None

200144 Comment

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Greater Cambridge Shared Planning
Date received: 30/09/2024 via Email

Summary:

Please find attached South Cambridgeshire District Council's response to the Thriplow and Heathfield Neighbourhood Plan, submission (Regulation 16) Plan Consultation.

Full text:

Please find attached South Cambridgeshire District Council's response to the Thriplow and Heathfield Neighbourhood Plan, submission (Regulation 16) Plan Consultation.

Attachments:

Thriplow and Heathfield Reg16 Council Response (2).pdf - https://cambridge.oc2.uk/a/3v6wt

South Cambridgeshire District Council response to Thriplow and Heathfield Neighbourhood Plan Regulation Submission Consultation – 5 August to 30 September 2024

1. South Cambridgeshire District Council previously commented on the Pre-Submission (Regulation 14) draft of the Thriplow and Heathfield Neighbourhood Plan that was consulted on in March 2023. South Cambridgeshire District Council is taking the opportunity to comment further on the Submission (Regulation 16) Plan.

2. South Cambridgeshire District Council has worked with the Thriplow and Heathfield Parish Council during the preparation of the plan. We appreciate the hard work that has gone into getting the neighbourhood plan this far along in the process.

3. We note that the Submission version of the Thriplow and Heathfield Neighbourhood Plan has been revised after considering the representations received during the Pre-Submission (Regulation 14) consultation. South Cambridgeshire District Council submitted 82 comments in our Pre-Submission response, most of which have been taken into account and have resulted in revisions to the plan. We very much welcome the changes that have been made.

4. There have also been meetings with the Thriplow and Heathfield Parish Council to discuss the plan as it has evolved and to support the Parish Council in preparing the Submission version of the plan.

5. The comments we now make now concentrate on matters that relate directly to whether, in our opinion, the Thriplow and Heathfield Neighbourhood Plan meets the Basic Conditions.

Policies Map

6. Our Pre-Submission response recommended one overall “Policies Map” on an Ordnance Survey base is included in the Plan with, where necessary, more detailed inset maps for specific areas – for example there could be one showing the whole parish and insets for the policies. Where planning policies relate to a specific site or area of land it is essential that the boundary of that designation can be clearly identified on a map. Also, we would suggest that policy THP 10 is referred to on the broader proposals map. This map has not been included and we therefore continue to recommend this addition be included in the Referendum Plan.

Planning Policies

7. Paragraph 6.1 (page 36) states: "This chapter contains the planning policies. These planning policies will provide the basis for the determination of planning applications involving land that falls in the Thriplow and Heathfield NP area." We recommended that this paragraph recognise that the polices in the plan contribute to the wider South Cambridgeshire area development plan documents and national policies. As worded, it implies this is the sole basis for planning applications in the area and the local plan and National Planning Policy Framework (NPPF) become null and void.

8. Section 6.11.2 and page 46 references the 2021 NPPF. The amended National Planning Policy Framework was published on 19 December 2023 and so the Plan should be updated accordingly to reference NPPF 2023, paragraph 131 unless, by the time the Referendum Plan is prepared the new Revised NPPF has been published. It may well be the case that the new NPPF will have been published before the examination of the Plan is complete and we would ask the Examiner to address how the Plan references any changes to national policy and whether focused consultation on how the new NPPF impacts on the submitted Neighbourhood Plan is necessary?

Policy THP 1: Improving the character and quality of Heathfield

9. It is noted that amendments to this policy have been made and in particular we are pleased that additional photographs (figures 1 to 7) have been added to illustrate the assessment of the issues raised and which supports the design rationale for the policy.

10. In terms of the policy itself, we remain of the opinion that the scope needs to be narrowed and parts that repeat policies in other sections of the Plan should be removed. All planning policies in the neighbourhood plan will apply, as appropriate, to the consideration of planning applications. We consider that the following amendments would help to achieve this clarity:
    - Policy part 3) ‘Existing challenges relating to design, landscaping and layout at the Heathfield estate will not be accepted as an excuse for poor standards of design in any future development’ is removed. Policy HQ/1 of South Cambridgeshire’s Local Plan requires that all new future development must be of high quality design. Similarly, each application should be judged on the merits of the application, rather than the precedent (good or bad) of what has gone before.
    - Suggest in Policy part 4) that ‘expected’ is replaced with encouraged, this is because it is unreasonable to expect all development proposals to improve the character of the area.
    - Suggest in Policy part 4) that ‘as far as they are applicable to the proposal’ lacks clarity and could be removed.

11. For policy part 2) we recommend that the following wording is added to the policy as part 2) b) ‘’ Where trees are within any proposed development site, tree information will be required conforming to BS5837: Arboricultural Impact Assessment and tree survey. To manage tree retention and tree mitigation planting opportunities ‘’. The current part b) would become part 2) c).

12. Policy part 4) states "where the scale permits". This wording is too vague and needs to be more specifically defined. Is a householder application too small to be affected? Is it major (as defined by the NPPF) applications only? Only residential development? There is also repetition of reference to the scale of the proposal”. Importantly, improvements to the environment, landscape and public realm outside a development site can only reasonably be delivered through a Section 106 Planning Obligations where, in accordance with paragraph 122 of the Community Infrastructure Levey Regulations, such an Obligation “may only constitute a reason for granting planning permission for the development if the obligation is-

a. (a)necessary to make the development acceptable in planning terms;
b. (b)directly related to the development; and
c. (c)fairly and reasonably related in scale and kind to the development.”

Paragraph 5 of the Policy acknowledges this and, as such, the usefulness of paragraph 4 is questioned.

Policy THP 2: Provision of additional amenities in Heathfield

13. No amendments to the wording of this policy have been made since our pre-submission response, and our comments are therefore re-iterated:

- Our Pre-Submission response reminded the Parish Council that if there is no new development in Heathfield (which the Neighbourhood Plan states it doesn’t support), then there will not be new developer contributions to provide the additional amenities sought in Policy THP2, unless in the specific circumstance that a fully funded application for community use is submitted.
- Also, our pre-Submission response commented that in relation to the policy part 2), whilst it appears the intention is to secure community uses compatible with continued employment use of the site, as an existing employment site Local Plan Policy E/14 Loss of Employment Land to Non Employment Uses would apply.

14. Policy part 1) states "strongly supported". It is recommended that ‘strongly’ is removed so this is amended to state "supported" only.

15. Also is the "shop" referred to meant to be a "community shop"? Otherwise it implies any Use Class E (such as a corner shop etc) will be acceptable.

Policy THP 3: Protecting and enhancing village character in Thriplow

16. The objective and policy aims continue to be supported.

17. In the submission version of the plan it is noted that a new section has been added to policy THP 3, at part 3) which the Parish Council has noted has been added to clarify that development proposals that would erode the character of the rural lanes would not be supported. The character appraisal provides evidence to support the insertion of the first part of this clause. However the latter section is very similar, but does not exactly repeat, the requirements of part 4) of Policy TI/2: 'Planning for Sustainable Travel' of the South Cambridgeshire Local Plan. We recommend removing the section 'through a transport assessment or, in the case of a smaller schemes, in an accompanying Design and Access/Planning Statement' as the plan can highlight localised traffic capacity and safety issues, or infrastructure deficiencies that would need to be addressed when considering development proposals but it is the responsibility of the local planning authority (LPA) to assess development proposals submitted for planning permission.

Policy THP 4: Important Countryside Frontages in Thriplow village

18. In our pre-submission response we acknowledged that the views and distinctiveness of the surrounding landscape are important to the village but their protection must be brought about in other ways more in keeping with Local Plan policy purposes. Also, we noted that a considered Landscape Character Study had been provided and this document potentially provided a series of high-level recommendations which could be used to convey what would be acceptable or unacceptable when it comes to development. This would offer a better and more joined up approach to managing development. We continue to highlight these comments.

19. We note that amendments to this policy have been made to remove 3 of the proposed Important Countryside Frontages (''The View'', ''The Baulk'' and ''Narrow Lane''). However, it is reiterated from our previous comments that the two frontages remaining to be designated as Important Countryside Frontages (as defined in the 2018 Local Plan), 'Sheralds Croft Lane and Foremans Road' and 'Churchyard', do not fulfil the criteria in part a) or b) of policy NH/13 of The South Cambridgeshire's Local Plan policy. It is important that the ICF conform to the approach taken in the Local Plan policy. Also, both proposed ICFs, by virtue of being outside the development framework and within greenbelt, assume an already established resistance to development in these areas, especially as they are not accessible from a street.

Policy THP 5: Parish-wide locally valued views

20. Our pre-submission comments recommended that further consideration should be given to the evidence behind the identified views to ensure they are robustly justified and stand up to scrutiny during decision making. We note that the submission version has updated Appendix 2 to include an assessment of views from Heathfield and that the additional wording within the applicable findings from the Landscape Character Assessment 2020 sections now generally provide a more robust link to how the proposed views relate to the character-based work. However, we question the validity of View 11 'from greenway at Kingsway' as it is not so much a view as protection of a field to the north of Kingsway development. Also, View 12 is unnecessary and the view is misidentified as from a point beyond the hedgerow boundary around the open space while the description states it is from Ringstone across the open space. The amount of enclosure which the open space enjoys does not allow for those outward views. A small gap in the hedge equally does not allow for a distinct view. Therefore, we recommended that view 11 and view 12 are removed.

Policy THP 6: Supporting the rural economy

21. It is recommended that part 1) of Policy THP 6, is changed from 'will be permitted subject to' to 'will be supported subject to'.

22. Policy needs to include semi-colons and to say "and" "or". Based on the current list without this, it could be argued that proposals need only do one of the criteria.

23. We query whether the policy is supporting proposals for new employment development (B1, B2 and B8 uses) and/or expansion of existing employment premises, and/or other uses? Currently the policy is not clear on what 'type' of development this policy is supporting as the policy states 'Development proposals which support existing agricultural and other land-based rural businesses…'. Amendments should be made to the policy wording to provide clarity and to be consistent with Local Plan policies E/12, E/13, E/16, E/17 and E/18. Also, we suggest rewording to 'New Development'.

24. Recommend removing part 1) b) 'Not damaging the residential environment or have an unacceptable impact on the roads in the parish'. Also, in part 1) c) it is recommended to remove 'and tranquillity' and 'through inappropriate urbanisation, noise or light pollution'. This point would read 'Not adversely impacting rural character in the parish'. These changes are suggested as

Policy HQ/1 of South Cambridgeshire's Local Plan protects the health and amenity of occupiers and surrounding uses from development that is overlooking, overbearing or results in a loss of daylight or development which would create unacceptable impacts such as noise, vibration, odour, emissions and dust. Policy SC/9 of South Cambridgeshire's Local Plan states that 'Development proposals which include new external lighting will only be permitted where it can be demonstrated that: ... there is no unacceptable adverse impact on the local amenity of neighbouring or nearby properties, or on the surrounding countryside'. The supporting text for the policy does not evidence what would be considered as inappropriate urbanisation. 'Tranquillity' is an ambiguous qualitative term which would need to be evidenced in quantitative terms if proposals were asked to ensure they would not cause any adverse impacts.

25. In regard to any unacceptable impact of development proposals on roads in the parish, the Neighbourhood plan can highlight localised traffic capacity and safety issues, or infrastructure deficiencies that would need to be addressed when considering development proposals. However, this policy wording is slightly ambiguous as the supporting policy text states that 'leading to growth in traffic movements along rural roads', presumably it's about traffic generation? We would recommend re-wording this policy objective to provide clarity on this point.

Policy THP 7: Heathfield Local Green Spaces

26. Paragraph 107 of the NPPF states that policies for managing development within a Local Green Space should be consistent with those for Green Belts. For consistency with other neighbourhood plans in the district, we would recommend that the wording in part 1) of the policy, relating to development on Local Green Spaces, is amended to "Development proposals within the designated local green spaces will only be supported in very special circumstances."

Policy THP 8: Promoting nature recovery by protecting existing sites and features, increasing parish biodiversity and delivering biodiversity net gain.

27. As per our Pre-Submission response we consider that overall, the policy repeats elements already contained in the adopted local plan and needs to focus on local elements. The most locally distinct element of the policy is part 3) but this lacks adequate evidence. We recommend the following changes:

- Part 2) needs to be shortened or removed because its bullet points are currently too similar to Local Plan Policy NH/4 Biodiversity.

- Part 3) refers to blue infrastructure, but there is nothing in the supporting text relating to this. Maybe this should be removed, as Policy THP 9 is more related to this?

- Parts 3 and 4) rely upon Map 19. However, we remain unsure as to the basis and methodology for identifying the suitability of these areas.
  - In relation to part 6) about developer contributions, we previously noted that this is quite similar to part 3) of policy NH/4 'Biodiversity' the adopted South Cambridgeshire Local Plan, and therefore we suggest that this part of the policy is removed.

28. We support the overall policy as outline and take this opportunity to highlight that:
  - currently the LPA is unable to dictate where offsite BNG credits are purchased/created (as the Environment Act 2022 specifically references a "free and open market"). Therefore, and outside of the neighbourhood plan, the Parish may wish to explore setting up their own Habitat Bank which could secure local offsite credits to meet the goals set out in this policy and,
  - the LPA can agree a Section 106 agreement (Town and Country Planning Act) to secure the 30 years of management with the landowner. This would help to secure biodiversity improvements closer to the parish, rather than further afield at one of the established Habitat banks near Fulbourn or West Wickham.

Policy THP 9: Protecting and enhancing the parish tributary feeding the Hoffer Brook

29. Our Pre-Submission response for Policy THP 9 recommended removing part 2) because it repeats local plan policy and to focus the policy on Hoffer Brook (which has good evidence to back-up the case for its protection). It might be more appropriate to move the list of works to supporting paragraphs, given that during the lifetime of the Plan other initiatives might be required to improve Hoffer Brook and its tributaries. As part 2) has not been amended, we continue to make these recommendations.

30. Part 1) and Part 2) (please also refer to comment above) of Policy THP 9 need to be clearer about what "development proposals". This is recommended as it is disproportionate and onerous to require a householder application to do all of this. Policy needs to specify minor development or words to that effect.

31. It is noted that the Submission version of the plan now includes a reference to the Cambridgeshire Flood and Water Management SPD and the Council supports the inclusion of this reference as it provides relevant guidance.

However, this document does not include word ‘management’ in the title and should be referenced ‘the Cambridgeshire Flood and Water SPD’.

32. Part 2) of Policy THP 9 references ‘SPD Biodiversity Issue B6 – Sustainable Drainage Systems’, it is recommended that this reference is amended to ‘Greater Cambridge Biodiversity SPD, Sustainable drainage systems, paragraph 5.5.16- 5.5.20. This provides clarity as to which specific document and section the policy is referencing.

33. However, as SPD’s provide guidance instead of policy we recommend that part 2) removes the reference to the SPD and that both references to SPD’s are added to the supporting text for the policy. Part 2) should be amended to ‘’All proposals will be expected to incorporate sustainable drainage measures as a way of both managing surface water flood risk and protecting water quality in the parish.’’ And the supporting text should include ‘’It is expected that reference will be made to the Cambridgeshire Flood and Water SPD and the Greater Cambridge Biodiversity SPD (particularly section, paragraphs 5.5.16 to 5.5.20)’’.

Policy THP 10: Grainstore site allocation

Within our Pre-submission response we objected to the affordable homes on this allocation being prioritised for local people. However, we have subsequently advised the Parish Council that we no longer object in principle to local connection criteria being applied to the affordable homes on this development. We now consider that it is acceptable for any additional allocations identified in Neighbourhood Plans (i.e. sites that are not already Local Plan allocations or sites with planning permission) to include a local connection criteria, as although these allocations will contribute to meeting overall district-wide housing needs, they are generally brought forward to meet local needs, in a similar way to rural exception sites which have a local connection criteria applied.

34. We recommended in our Pre-submission response that part 7) c) (previously second i) was amended and as no change has been made we reiterate that this is amended to ‘’Enhance vegetation and hedgerows to maintain and encourage bat foraging opportunities’ as the current text seems quite specific.

35. Paragraph 6.10.13 makes a specific reference to the process for the site’s identification through the Parish wide call for sites in 2020, but the link in this paragraph is broken and it is not possible to view this supporting document which supports the sites availability and deliverability. If links to non-statutory supporting evidence documents are included in the plan it should be ensured that these links will remain accessible in perpetuity of the plan being an adopted part of the development plan.

36. Part 6) a) criteria need to include semi-colons and to say "and" "or". Based on the current list without this, it could be argued that proposals need only do either i) or ii) and iii).

Policy THP 11: Rural exception sites in Thriplow

37. No comment.

Policy THP 12: Improving parking provision and improving road safety in Thriplow and Heathfield

38. We noted in our Pre-Submission response that policy THP 12 refers to limiting the use of ‘rear parking courtyards’, but in some villages in South Cambridgeshire, parking courtyards have been successful as part of a variety of car parking options for residents in neighbourhoods. The submission version of the plan has no amendments to the policy wording and we therefore continue to suggest that the policy wording may be too prescriptive in restricting their use in future development proposals. The consequence can be car dominated streets and frontages which can be unsightly and restrict road widths for emergency and service vehicles.

39. We queried in our Pre-Submission response what evidence there is to support the statement that there is ‘proven underutilisation in the parish’. Paragraph 6.1.34 mentions the recommendation from the Masterplan for Heathfield undertaken by AECOM in 2022 to 'Undertake a design and access study of the rear parking courts at Ringstone and Hurdles Way to understand why they are underutilised and identify solutions' - has this study happened yet? We recognise the Submission version of the plan refers to page 80 of the 2022 AECOM Masterplan report which states 'Rear parking courtyards and garages are under used and constitute hidden spaces with limited positive contribution to the wider character of the Local Character Area', but in our opinion this does not offer robust evidence to support the policy wording of 'proven underutilisation'.

40. We also noted in our Pre-Submission response that given the uncertainty about the future of infrastructure contributions, it might be prudent to keep it broad and say ‘developer contributions’, rather than ‘S106 contributions’. This recommendation was made previously in relation to part 4) and is now re-iterated in reference to Part 3) c).

41. In relation to Part 3), Section 106 contributions can be secured (where conditions to achieve contribution are met) to achieve a good quality and

accessible walking and cycling environment to meet the needs of the users of the development. This is reflected in the South Cambridgeshire Local Plan Policy TI/2 and is not disputed. What is disputed is the suggestion that contributions could be used "towards the initiatives identified above" which would include car parking courts. This may not be the intent of the policy, so for clarity suggest policy part 3) c) is reworded to remove "towards the initiatives identified above".

Policy THP 13: Protecting and improving the rural footpath network and sustainable connections to neighbouring settlements

42. We continue to recommend that in part 1) 'expected' is amended to 'encouraged'.

43. There is uncertainty in relation to Part 2) and 3) of the policy- as although the intended routes to be improved are mapped there is not sufficient detail as to what specific route improvements are sought and how the improvements will be secured and delivered.

44. We recommended that Paragraph 6.13.8, Maps 23 & 24 (including reference in policy part 2), and policy section part 3) should be moved to Chapter 7 as these routes are aspirational rather than deliverable through the planning system. The reasoning for this recommendation is:

- In relation to Policy part 2) the process of securing contributions towards improvements is covered under other legal agreements not possible via S106. This part of the policy is recommended to be amended to '' Where necessary to make a development proposal acceptable and where directly and fairly and reasonably related in scale and kind to the development, contributions towards improvements to existing networks (on Maps 21, 22) will be sought.''

- Parts of the mapped network (2 footpaths) are permissive rather than part of the public rights of way network, and as such offer little value in terms of achieving the policy objective. In relation to public highways, we would like to highlight that agreements which include obligations relating to highways sections 38 and 278 of the Highways Act 1980 may apply (these sections govern how land can be adopted by the Local Highway Authority as public highway maintainable at the public expense (s38), or secure monies for works to the existing highway or allow the developer to procure such works itself). As such, we consider that it may not be possible for a developer to deliver Part 3) of the policy for aspired to routes as the land may not be within their control. Therefore, the requirement is potentially unreasonable when applied to all development proposals.

Policy THP 14: Development proposals resulting in better links between the Heathfield and Thriplow communities.

45. We previously noted that part 2) and paragraph 6.14.4 were added to the pre-submission plan as a requirement from the HRA but suggested that part 2) does not belong in this policy and is similar to THP 10. We reiterate our understanding of the reason that sub clause 2) has been added (as a requirement from the HRA of the NP) but we amend our previous comment and confirm that the council support the inclusion of part 2) of the policy (as is also the case for part e) of policy THP6) as any development linked to the rural economy or integrating the Heathfield and Thriplow communities will need to avoid negative impacts on hedgerows and disruption to bat flight lines. This will maintain the value of the Eversden and Wimpole Woods SAC by protecting its bat population.

Policy THP 15: Thriplow and Heathfield Infrastructure Priorities

46. The Council understands that Policy THP 15 – Thriplow and Heathfield Infrastructure Priorities, has been added to the Submission plan as a direct result of comments made in our Pre-Submission response (see section below 'Developer Contributions). It is considered that this policy insertion has tried to respond to many of the Councils previous recommendations regarding developer contributions but do not consider that insertion of a new policy is the correct approach. We recommend that this policy is changed to be a community aspiration within Chapter 7.

General comments on the Thriplow and Heathfield Plan

47. Our Pre-Submission response highlighted that a paragraph needs to be added in the Neighbourhood Plan to explain that the applicable neighbourhood area is the one designated under the old parish name. Also, the Neighbourhood Plan needs to explain that since its designation the parish has been re-named but the neighbourhood area remains in force. We continue to recommend adding this information into the introduction section of the Plan; this recommendation is made irrespective of the wording included in paragraph 1.3 and 1.4 of the Thriplow and Heathfield Basic Conditions Statement.

48. The front cover of the Neighbourhood Plan should say that the plan was prepared by Thriplow and Heathfield Parish Council (as the Parish Council are the 'qualifying body' to carry out a neighbourhood plan).

49. Our Pre-Submission response noted that Paragraph 4.6.17 needed refinement and as no amendment has been made to the submission version

our recommendation is re-iterated. Having a lot of glass on the floor does not necessarily disprove Highways England's designation of the road as being a safe road, because the existence of broken glass might not be the thing that Highways England measures to determine whether a road is safe or not. It is entirely valid to flag the community's concern at this road, but this doesn't necessarily disprove official statistics. Therefore, we would remove the below lines:

> ''The survey also revealed that there had been many accidents here, perhaps not reportable and therefore the police and County Highways did not know about them, so they say that the junction is a safe junction. However, the amount of broken glass, etc. proves otherwise. Conversations held with local employees in the area further supports this assertion. Safety standards have been reduced further at this junction, recently, since the general lane widening process took place in 2018, at the expense of the exposed central lane for turning right.''

50. Our Pre-Submission response noted that the pre-submission plan made no reference to consultation with businesses and as a requirement of the process, it should be addressed. It is noted that the Consultation Statement reflects the consultation undertaken with local businesses (pages 5, 6, 11 and 30), fulfilling the requirements. However, we would still suggest referencing the consultation undertaken with business in the plan by including this in the consultation summary section Chapter 3.

51. We note that a number of the policies could be amended to be positively worded as per the NPPF (2023) paragraph 16, b. For example, removing terms like 'will not be supported'.

52. Our Pre-Submission response commented on Paragraph 6.1.27 a), this section is now numbered 6.1.28 but no additional amendments have been made to the submission plan for this section. We re-iterate and expand our previous point.

53. Clarity is needed about where hedging and trees would be acceptable and why. Are trees and hedges acceptable near to the path? A metre, 6 metres? Is the purpose of the offset to avoid crowding on the path? Perhaps a small diagram could be provided? Or wording added to explain where and why instead of or in conjunction with the current wording. Currently it is unclear as to what the plan is trying to control with this recommendation.

54. In relation to paragraph 6.1.33 (c) – the council supports the maintaining of non-kick-about areas as wildflower meadows with enhancement such as bug hotels and log-piles. However, we take the opportunity to make the parish aware that it is not just about reducing the cutting regime, other management and establishment processes will need to be undertaken otherwise these

areas are more likely to become bramble and nettle scrub rather than wildflower grasslands.

55. Paragraph 6.1.37 states ‘not identified in this plan’ but which plan is this?

56. Paragraph 6.13.8 should be moved to Chapter 7 as it is aspirational rather than deliverable through the planning system.

57. Our Pre-Submission response commented on Paragraph 6.14 – In relation to ‘Discussions are currently underway’ we suggested that it might be worth adding a date in to what is ‘current’, as this could be unclear, e.g. ‘in 2023 discussions…’. The Submission plan has been amended to ‘Discussions do take place’. We continue to recommend that clarity is provided as this change is still ambiguous, including specific detail of which discussions have informed views would make this point clearer.

Maps

58. The Map image in Appendix 2 titled 'Map 7: *Community and outdoor recreation facilities in the Parish*' is a cropped version of Map 22: Existing rural routes for non-motorised users. Parish Wide. It is assumed that the image is correctly shown and the caption for the Map title/number should be amended to reflect this is showing Map 22.

59. For Maps 3 and 4 – the individual annotated numbers for the 36 heritage assets on the map are dispersed quite randomly. It might help the reader if these were arranged with numbers going up 1, 2, 3 etc from left to right across the map or grouped in 3 clusters in Thriplow village.

60. We recognise that amendments to Map 20 have been made and it now includes scale bar and wider red line site boundary. However, the map has a distorted resolution and should be improved.

61. In the referendum version of the Plan it will be important to ensure that all Map numbers are correct. Currently we are unsure that they are?

62. Map 7 is different in the Plan and in Appendix 2 – Suggest re-number appendix as new map.

Plan Period

63. Our Pre-Submission response noted that the Plan period is to 2041, whereas the adopted South Cambridgeshire Local Plan covers the period to 2031. The Council is preparing a new joint Local Plan which will extend into the 2040's but this process is not expected to conclude until after the neighbourhood plan has been adopted. This may result in future differences between the two plans reflecting the context within which both plans are being prepared. We will nevertheless seek to minimise any potential policy conflicts through that process, but it is important to be aware of the possibility of such conflict at this stage.

Green Belt

64. Our Pre-Submission response noted that references to the designated green belt and its purpose are noticeably missing from much discussion in the draft Plan. The Green Belt provides substantial protection from development and, together with Local Plan policies regarding development outside the Development Frameworks, provides a strategic framework for the consideration of development proposals in the neighbourhood plan area. Perhaps in the Introduction, the Neighbourhood Plan group could add a sub-header explaining how Green Belt policy protection is particularly important for this area, and reference the specific policies set out in Chapter 13 of the

National Planning Policy Framework and Policy S/4 in South Cambridgeshire Local Plan. Then when writing about a site in the Green Belt it would be sufficient to note that it is covered by the policy protection of the Green Belt. We continue to recommend a sub-headed section is added to the introduction which highlights the policy protections of Green Belt designation.

Developer Contributions

65. Our Pre-Submission response highlighted that South Cambridgeshire's Local Plan, seeks S106 contributions in relation to Policies NH/5, SC/10, and TI/2. In Policy TI/8, the Plan sets out how S106 and Community Infrastructure Levy (CIL) will be used to pay for infrastructure on new developments. However, SCDC has chosen not to collect CIL so far. If and when SCDC adopts CIL then it will pass a proportion of the CIL receipts from the development to the parish council. The parish council must use the CIL receipts passed to it to support the development of the parish council's area by funding the provision, improvement, replacement, operation or maintenance of infrastructure; or anything else that is concerned with addressing the demands that development places on the area. In such circumstances CIL monies could be used to achieve the objectives of THP-1. If the Council does not adopt CIL then infrastructure improvements will be funded through section 106 planning obligations. Unlike CIL these must be used solely to mitigate the impact of development and it is common principle that planning obligations should not be used solely to resolve existing deficiencies in infrastructure provision or to secure contributions to the achievement of wider planning objectives that are not necessary to allow consent to be given for a particular development.

66. Our pre-Submission response noted that the implication for parishes is that the Infrastructure Levy would mean that funds wouldn't have to be tied to mitigating the impact of development (as they currently are with S106) and so potentially some of the funds from new development could be passed to parishes for identified spending targets that are not related to the development. Therefore, where the Plan identifies spending targets for developer contributions, it is suggested that the language remains broad enough so that they could be applied to different policy realities. We also suggested that given the low amount of funds which might come from new development, that it was worth considering asking for S106 funds on a more focused number of issues.

67. Our Pre-Submission response noted that the Plan asks for S106 contributions to address a number of issues. SCDC pointed out in the previous comments on an early draft of the Plan that the Plan aspired to improve Heathfield using S106 money, but that S106 funds can only be spent in the near vicinity of the area (in-line with NPPF). This contradiction remains; in paragraph 5.3 of the Plan, it is stated that the Plan doesn't see Heathfield as an appropriate place

for additional residential growth, however, if there is no new development, no new S106 funds will be accrued and therefore no improvements can be made. The Submission Plan has not been amended and the contradiction at Section 5.3 remains, we therefore continue to highlight this point.

68. In relation to paragraph 6.1.26, c) - ‘‘Use section 106 funds and other locally available funding (e.g. CIL monies), to foster pride and sense of possibility to improve area’’. We recommended that either this sentence is removed or amended to ‘‘Use section 106 funds and other locally available funding (e.g. CIL monies), to improve the public realm’’. S106 is not capable of being objectively used to foster pride.

200146 Comment

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Natural England
Date received: 01/10/2024 via Email

Summary:

Please find Natural England’s response in relation to the above mentioned consultation attached herewith.

Full text:

Please find Natural England’s response in relation to the above mentioned consultation attached herewith.

Attachments:

485039 Thriplow Heathfield Neighbourhood Plan NE Response.pdf - https://cambridge.oc2.uk/a/3v6w3

Date: 25 September 2024
Our ref: 485039
Your ref: Thriplow and Heathfield Neighbourhood Plan

Mr Jonathan Dixon
South Cambridgeshire District Council

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BY EMAIL ONLY

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Dear Mr Dixon,

Thriplow and Heathfield Neighbourhood Plan – Regulation 16 Consultation

Thank you for your consultation on the above dated 05 August 2024

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Chloe Lancaster
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The Magic[1] website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from the Association of Local Environmental Records Centres .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here[2]. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here[3].

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the Magic[4] website and also from the LandIS website[5], which contains more information about obtaining soil data.

Natural environment issues to consider

The National Planning Policy Framework[6] sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance[7] sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

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[1] http://magic.defra.gov.uk/
[2] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[3] https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making
[4] http://magic.defra.gov.uk/
[5] http://www.landis.org.uk/index.cfm
[6] https://www.gov.uk/government/publications/national-planning-policy-framework--2
[7] http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here[8]), such as Sites of Special Scientific Interest or Ancient woodland[9]. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed here [10]) or protected species. To help you do this, Natural England has produced advice here[11] to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see Guide to assessing development proposals on agricultural land [12].

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the National Planning Policy Framework. If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

[8] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[9] https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences
[10] https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england
[11] https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals
[12] https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory Biodiversity Metric may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the Small Sites Metric may be used. This is a simplified version of the statutory Biodiversity Metric and is designed for use where certain criteria are met. Further information on biodiversity net gain including planning practice guidance can be found here

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's Green Infrastructure Framework sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance[13]).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory Biodiversity Metric and is available as a beta test version.

[13] https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space

200147 Support

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Mr Kevin Clarke
Date received: 16/09/2024 via Email

Summary:

Comments largely in support of the Plan, and as follows.

1- Junction between A505 and Gravel Pit Hill. This right turn from the A505 going West is very dangerous and should be prioritised for improvement. There is enough space for a bit of road widening. Even the turn from the A505 going East is dangerous as the turning vehicle has to slow down to at most 20mph to get round the corner, there is enough room here for a deceleration lane.

2. I very much support the Plan for development of the Grain Store site with up to 20 dwellings, including Affordable and/or Social Homes.

3. I support the improvement of Hoffer Brook. Until I started walking our dog, I had not noticed how dead the brook looks (at the bridge near the new donkey sanctuary). If it is supposed to be a chalk stream, it falls a long way short. Quite often the brook is a milky grey but even when the water is clear, there is not a sign of life in it. I suspect pesticides and herbicides but I am no expert. I also wonder if the root cause of the supposed pollution is outside our Parish via geological aquifers, maybe between the A505 and Chrishall?

4. There must be a way of claiming space from some of the verges to make footpath space without stealing road width. This could be done for some of Middle Street, Church Street and perhaps Lower Street. Certainly a 20mph limit and HGV weight limits will help safety but existing footpaths need to be better maintained (eg the one between Fowlmere Road and Fowlmere which gets very overgrown) and any new ones we can create, should be. I think we are too lax on letting people's hedges getting overgrown as well - the odd encouragement in FATN from the Parish Council isn't good enough.

Full text:

I have a few comments to make, largely in support of the Plan.
My comments are as follows.
1. Junction between A505 and Gravel Pit Hill. This right turn from the A505 going West is very dangerous and should be prioritised for improvement. There is enough space for a bit of road widening. Even the turn from the A505 going East is dangerous as the turning vehicle has to slow down to at most 20mph to get round the corner, there is enough room here for a deceleration lane.
2. I very much support the Plan for development of the Grain Store site with up to 20 dwellings, including Affordable and/or Social Homes.
3. I support the improvement of Hoffer Brook. Until I started walking our dog, I had not noticed how dead the brook looks (at the bridge near the new donkey sanctuary). If it is supposed to be a chalk stream, it falls a long way short. Quite often the brook is a milky grey but even when the water is clear, there is not a sign of life in it. I suspect pesticides and herbicides but I am no expert. I also wonder if the root cause of the supposed pollution is outside our Parish via geological aquifers, maybe between the A505 and Chrishall?
4. There must be a way of claiming space from some of the verges to make footpath space without stealing road width. This could be done for some of Middle Street, Church Street and perhaps Lower Street. Certainly a 20mph limit and HGV weight limits will help safety but existing footpaths need to be better maintained (eg the one between Fowlmere Road and Fowlmere which gets very overgrown) and any new ones we can create, should be. I think we are too lax on letting people's hedges getting overgrown as well - the odd encouragement in FATN from the Parish Council isn't good enough.

Attachments: None

200148 Comment

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: National Grid
Date received: 30/09/2024 via Email

Summary:

Please find our letter of representation on behalf of National Grid Electricity Transmission attached.

Full text:

Please find our letter of representation on behalf of National Grid Electricity Transmission attached.

Attachments:

Nat Grid 24.09.30 Thriplow Heathfield_Redacted.pdf - https://cambridge.oc2.uk/a/3v6w6

AVISON YOUNG

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avisonyoung.co.uk

Our Ref: MV/ 15B901605

30 September 2024

South Cambridgeshire District council
neighbourhood.planning@greatercambridgeplanning.org
via email only

Dear Sir / Madam
Thirlplow and Heathfield Neighbourhood Plan – Submission public consultation August – September 2024
Representations on behalf of National Grid Electricity Transmission

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission
National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets:
An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

NGET provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to NGET infrastructure.

Distribution Networks
Information regarding the electricity distribution network is available at the website below:
www.energynetworks.org.uk

Further Advice
Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

[redacted]

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Tiffany Bate, Development Liaison Officer

[redacted]

National Grid Electricity Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[redacted]

Matt Verlander MRTPI
Director
[redacted]
For and on behalf of Avison Young

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgridet.com/document/130626/download

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their *'Guidelines when working near National Grid Electricity Transmission assets',* which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

200149 Comment

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: British Horse Society
Date received: 30/09/2024 via Email

Summary:

Attached please find comments on behalf of the British Horse Society.

Full text:

Attached please find comments on behalf of the British Horse Society.

Attachments:

BHSTHR~1.DOC - https://cambridge.oc2.uk/a/3v6w4

Patron His Majesty The King

Bringing Horses
and People Together

The British Horse Society
Abbey Park,
Stareton,
Kenilworth,
Warwickshire CV8 2XZ

Email enquiry@bhs.org.uk
Website www.bhs.org.uk
Tel 02476 840500
Fax 02476 840501

Thriplow and Heathfield Neighbourhood Plan Consultation **30 September 2024**

Comments on behalf of the British Horse Society

Improving rural routes for non-motorised users

7.9 **Community Initiative 6: Improving our rural routes for non-motorised users.** The Parish Council will work with interested groups to improve and develop routes for sustainable travel on horseback, bicycle and foot to the nearby villages of Newton, Whittlesford, Fowlmere and Foxton (Map 21). Particular emphasis would be given to establishing good routes to the railway stations at Whittlesford and Foxton.

The BHS fully supports this proposal. Any new ROW created should be bridleways or byways. Local equestrians would like to see more of the ROW access available to them. Public money should be spent inclusively and include all non-motorised users. This includes money from Developers for new ROW.

Policy THP 13 – Protecting and improving our rural routes for non-motorised users and creating sustainable connections to neighbouring settlements.

1) All new development will be expected to protect existing rural routes available to for non-motorised users in the parish. (see Maps 21, 22 and 25).
2) Where necessary to make a development proposal acceptable and where directly and fairly and reasonably related in scale and kind to the development, contributions towards improvements (see existing and aspired to networks on Maps 21, 22, 23, 24) to this network will be sought.
3) Where a development proposal comes forward which presents an opportunity – see Maps 23 and 24 - (e.g by way of its location) for improving the existing footpath, bridleway and cycling routes, such opportunities should be taken.

Whilst we support maintenance of PROW's, the work 'improvement' can become synonymous with changing a rural right of way to a tarmac path for cyclists. We would strongly oppose such changes. Any change of surface to the PROW now has to be applied for with the opportunity for the Cambridgeshire Local Access Forum to object.

There is a paucity of rights of way in Thriplow:

The Cambs ROWIP acknowledges that the bridleway network is disjointed, inadequate and in need of improvement. There is an opportunity to improve the bridleway network and thereby access for equestrians (it is acknowledged that there is a large number of equestrians in the parish) by upgrading footpaths to bridleways. We would ask that this is included on the wish list within the Plan.

Improvement to the network can act as a catalyst to further improve the network for all users when opportunities become available.

Another route to improve the PROW is by the inclusion of lost highways – historic public routes which have never been extinguished but are not currently on the Definitive Map. The BHS is aware of three such routes in Thriplow marked bright blue on the attached map:

All need further investigation and if the evidence is found, DMMO applications need to be submitted. Currently, the BHS does not have the capacity to undertake these applications, but we would like them recorded on the NP as potential public rights of way of at least bridleway status. These routes should be investigated if they are threatened by any form of development.

Newton is equally bereft of bridleways:

However, again we are aware of routes which may be lost highways:

When considering any changes to road layouts, consideration should also be given to equestrians. In the Highway Code Hierarchy of road users – pedestrians are listed as the most vulnerable road user, followed by horses and cyclists. This new rule highlights that, irrespective of method of transport, those who can do the greatest harm have the greatest responsibility to reduce the danger or threat they may pose to others.

Public money should be spent inclusively to include all Non Motorised Users (NMUs), which includes equestrians and disabled mobility scooters. The majority of equestrians are female, compared to the majority of cyclists being male. There should not be an inequality in how these road users are treated when it comes to road safety.
Any changes/'improvements' to road layouts for the benefit of cyclists must not put equestrians at greater risk. If there is an accident, as a result of a change to the road layout which disadvantaged equestrians, in which an equestrian was injured then the Council could be considered to be liable.

Additional Comments and information from the British Horse Society

I welcome the opportunity to comment on the local Neighbourhood Plan, and to be able to put forward an equestrian point of view which can often be overlooked by Councils when considering Active Travel proposals.

Safe routes for equestrians are desperately needed because the accident statistics in respect of horses on the roads are horrific. There have been 5,784 incidents reported to the British Horse Society since 2010, 44 people have lost their lives, 1350 have been injured, 441 horses have been killed, 1,198 horses injured, and 75% of these incidents involved vehicles passing too close to the horse and/or too fast.

The British Horse Society is the UK's largest equestrian Charity, with over 119,000 members representing the UK's 3 million equestrians. Nationally horse riders have access to just 22% of the rights of way network and carriage drivers to just 5%. This network has become increasingly fragmented by roads, which were once safe rural routes, but have now often become busy thoroughfares.

Whilst the Society supports the national initiative to encourage more cycling and walking as part of Active Travel Plans, it is imperative that the Council recognises that Active Travel also includes equestrians.

Central government support for including horses:

The government's Cycling and Walking Investment Strategy Safety Review says: "1.2 But safety has particular importance for vulnerable road users, such as walkers, cyclists and horse riders. All road users have an equal right to use the road, and safety and the perception of safety are key factors in determining how far people use these modes of transport. The safer they feel, the more they will use these active modes of travel. The more people who use Active Travel, the fitter and healthier they will be, and the more their communities will benefit from lower congestion and better air quality, among a host of other benefits"(Jesse Norman, Minister for Transport.

Jesse Norman in House of Commons debate on Road Safety, 5 November 2018:

"We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders"

And final point by Jesse Norman in debate: "Horse riders are vulnerable road users—there is no doubt about that, and there never has been—and they have been included in the work we are doing."

Newly Constructed Paths

Any physical creation of new paths to achieve Active Travel objectives within the county is to be welcomed (provided that equestrians are included, as a minimum, on those outside of large town centres), as this will enhance the ability of the public to increase its access to safe off road routes for leisure and commuting. District Authorities should take a strategic approach to Active Travel proposals within their administrative boundary - giving consideration to potential links outside their boundaries that could contribute to a more integrated network and achieve maximum benefit for all users.

Use of Existing Public Rights of Way

I recognise that some of the routes within this consultation could be in urban areas. However, many horses are kept on the urban fringe, so it is important that equestrians are not excluded from routes that exit the urban areas into the surrounding environs.

Active Travel routes should not, in any way, compromise the use of the public rights of way by making them less amenable to existing lawful users of the right of way. In particular:

• Where existing routes are considered as part of the plan, it is important that all user groups are consulted so that the impact on other lawful users can be assessed and, if necessary, alternative measures discussed.

• For each specific proposal which uses a public right of way or minor road, the width, the proposed surface and the impact of increased estimated numbers of cyclists must be considered in order to design a route suitable for all legal users in each specific location.

• Any newly constructed paths should be integrated/physically linked with the existing public rights of way network where possible and needed, clearly waymarked and recorded on either the definitive map or another publicly accessible map as appropriate.

• Where proposed new, or improved routes have crossing points or junctions with the main highway network, appropriate signal-controlled (or even grade-separated) crossings should be provided suitable for all user groups.

• Consideration should be given to the use of 'Quiet Lanes'1 where the speed of traffic is reduced.

• Where motorised traffic is to be prohibited on either a right of way or minor road to facilitate cycling and walking, it must be remembered that this is likely to also benefit equestrians. Signage and structures must not impede equestrians

Other Considerations to Note

Commuting cycling is likely to take place at times other than when recreational use takes place. Thus, a path used for commuting may well be used for recreational travel especially if it provides a circular route by connecting to other paths.

Several categories of public rights of way (bridleways, restricted byways and byways) and minor public roads are already shared by cyclists and other user groups. Thus, as a general principle, we believe that, for maximum public benefit and fairness, the reciprocal approach should be implemented, i.e. that new cycle paths should be shared with other user groups unless there is a specific, unresolvable reason not to do so.

Use of Traffic Regulation Orders to prohibit use of a public right of way by a specific user group for the benefit of cycling needs to be fully justified and take into account the rights of other lawful users. It should be noted that the Defra Statutory Guidance to local authorities on Rights of Way Improvement Plans, 2002, states in para. 2.2.21:

'There is potential for conflict on ways carrying higher rights between different classes and types of users. Wherever possible proposals for improving rights of way should not unduly benefit one class of user at the expense of another. Improvements that are intended to benefit cyclists, harness-horse drivers, horse riders or walkers should not unduly restrict lawful MPV use of public vehicular rights of way'.

Equestrian use must be considered when Active Travel routes are proposed in new developments, so that new links can be created to the countryside beyond. Where new bridges/underpasses are proposed these should be suitable for equestrian use.

Effect of excluding Equestrians from Active Travel Routes

If equestrians are not an included user on active travel routes, the consequence is that equestrians are left on the carriageway with lorries and cars passing them on the outside and cyclists passing them on the inside, which is another accident waiting to happen. It is therefore important that this aspect is considered in the risk assessment for such routes.

The Health Benefits of Horse Riding in the UK.

(Data comes from research undertaken by the University of Brighton and Plumpton College on behalf of The British Horse Society)

• 68% of questionnaire respondents participated in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimate that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.

• Women have been identified in government studies as a social group with relatively low levels of participation in physical activity. Some 93% of questionnaire respondents were women and 49% percent of female respondents were aged 45 or above. These are comparable figures to a major Sport England survey which found that 90 percent of those participating in equestrianism are women and 37 percent of the female participants in equestrianism are aged 45 or above. The gender and age profile of equestrianism is not matched by any other sport in the UK2 .

• Amongst the horse riders who took part in the survey, 39% had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.

• Horse riders with a long-standing illness or disability who took part in the survey are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability.
For further information, please see: https://www.bhs.org.uk/~/media/documents/marketing/health-benefits-of-riding-in-the-uk-full-report.ashx?la=en

Benefits of catering for horses

The British Equestrian Trade Association National Equestrian Survey (2019)3 indicated:

• £4,174 is spent per horse which represents a significant contribution to the economy
• The value of the equestrian sector is £4.7 billion per annum
General Statistics
• 847,000 horses in Britain
• 1.8 million regular riders of 3 million total
• Lack of access to horses and riding facilities is a barrier for 22% of lapsed riders returning

REASONS TO INCLUDE EQUESTRIANS in the Neighbourhood Plan

- In 2017 the equestrian industry excluding the racing industry, contributed £4.3bn to the economy and is the second largest rural employer.
- The equestrian industry relies on a network of safe, off road access to the countryside.
- It was established at a Cambridgeshire County Council Planning meeting that, with good design, it costs no more to provide access for equestrians.
- Horses safely and happily share paths less than 3m wide all over the country.
- No report ever of any injury to a third party on any RoW by a horse.
- The Cambs RoWIP (Rights of Way Improvement Plan) states that the bridleway network is inadequate, fragmented and in need of improvement. Every shared pedestrian / cycle path further fragments that network.
- The majority of cyclists are male (78% : Sustrans) whereas the majority of horse riders are female (BHS).
- Horse riding has mental and physical health benefits. Older women particularly participate in this activity, where they may not otherwise exercise.
- Horse riders are a vulnerable road user, in the same way as walkers and cyclists.
- Equestrian accident statistics
- In the UK the period November 2010 to March 2019 road incidents involving horses :
- 43 humans died
- 315 horses died

- 3757 incidents were reported to the British Horse Society (BHS) although it is believed that this represents only 10% of the actual incidents.
- The East of England is one of the regions with the highest accident rate

Cambridgeshire County Council has a Local Transport Policy (LTP), which sets out their transport objectives, policies and strategy for the county. A sister document of the LTP is the Rights of Way Improvement Plan (ROWIP). The County Council updated its ROWIP in 2016 in line with the Countryside and Rights of Way Act 2000. You may wish to consult this document when drafting policies dealing with Non-Motorised Users (NMU) and the Public Rights of Way network.
https://cambridgeshire.gv.uk/residents/travel-road-and-parking/transport-plans-and-policies/local-transport-plan

Particular interest should be given to Policies S0A1 'Making the Countryside More Accessible', S0A2 'A Safer Activity', S0A3 '57,000 New homes', S0A4 'Knowing what's out there', S0A5 'Filling in the Gaps', and S0A8 'A Better Countryside Environment'– all of which include the need for access for equestrians.

Lynda Warth
County access & Bridleways Officer – Cambridgeshire
British Horse Society

200150 Comment

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Defence Infrastructure Organisation
Date received: 30/09/2024 via Email

Summary:

Please find attached my letter, confirming the safeguarding position of the Ministry of Defence, in respect of the above policy planning consultation.

Full text:

Please find attached my letter, confirming the safeguarding position of the Ministry of Defence, in respect of the above policy planning consultation.

Attachments:

20240805_MOD_Response_Redacted.pdf - https://cambridge.oc2.uk/a/3v6w7

Christopher Waldron

Ministry of Defence

Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire WS14 9PY

Mobile: +44 (0) [redacted]

E-mail: DIO-Safeguarding-Statutory@mod.gov.uk

[redacted]

Your reference: Thriplow and Heathfield Neighbourhood Plan
Our reference: 10063857

Planning Policy Team
South Cambridgeshire District Council
Cambourne Business Park,
Cambourne
Cambridge
CB23 6EA.

30th September 2024

Dear Planning Policy Team,

It is understood that South Cambridgeshire District Council are undertaking a consultation regarding their Thriplow and Heathfield Neighbourhood Plan (NP) Submission public consultation. This document will guide and set a framework for future development in the plan area.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Ministry of Housing, Communities and Local Government (MHCLG) in accordance with the provisions of that direction.

Copies of these relevant plans, in both GIS shapefile and .pdf format are issued to Local Planning Authorities by MHCLG. An assurance review was conducted by the MOD in 2023 which confirmed that, at that time, Local Planning Authorities held the most recent relevant safeguarding data. Any subsequent updates to those plans were then issued by MHCLG. If there is a requirement for replacement data, a request can be made through the above email address

The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.

The area covered by any Thriplow and Heathfield NP will both contain and be washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites including Cambridge Airport and the Eastern 1 WAM (Wide Area Multilateration) Network.

To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of the main safeguarding areas of concern is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

- Eastern WAM (Wide Area Multilateration) Network is a new technical asset, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Thriplow and Heathfield NP authority area.

- Technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing, and materials used to finish a development may all be factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to provide large expanses of metal at height, for example where proposals include a wind turbine or roof mounted solar PV system.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely

Chris Waldron
DIO Assistant Safeguarding Manager

200152 Comment

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Cambridgeshire County Council
Date received: 27/09/2024 via Email

Summary:

I refer to the consultation on the Thriplow and Heathfield Neighbourhood Plan and thank the Parish Councils for affording the County Council the opportunity to comment.

Please find attached to this letter comments that I have received from several service areas across the County Council. I trust that this will be of assistance to the Parish Councils as it progresses the Neighbourhood Plan.

Full text:

I refer to the consultation on the Thriplow and Heathfield Neighbourhood Plan and thank the Parish Councils for affording the County Council the opportunity to comment.

Please find attached to this letter comments that I have received from several service areas across the County Council. I trust that this will be of assistance to the Parish Councils as it progresses the Neighbourhood Plan.

Attachments:

CCC response to T&H_NP_Redacted.pdf - https://cambridge.oc2.uk/a/3v6w8

My ref: Thriplow and Heathfield Neighbourhood Plan

Your ref:

Date: 27 September 2024
Contact: Colum Fitzsimons
Telephone: [redacted]
E Mail: [redacted]

Frank Jordan,
Executive Director
Place and Sustainability
Planning and Sustainable Growth

New Shire Hall
Emery Crescent
Enterprise Campus
Alconbury Weald
PE28 4YE

Planning Policy Team
South Cambridgeshire District Council
Cambourne Business Park
Cambourne

By email - neighbourhood.planning@greatercambridgeplanning.org

Dear Sirs

Thriplow and Heathfield Neighbourhood Plan Consultation

I refer to the consultation on the Thriplow and Heathfield Neighbourhood Plan and thank the Parish Councils for affording the County Council the opportunity to comment.

Please find attached to this letter comments that I have received from several service areas across the County Council. I trust that this will be of assistance to the Parish Councils as it progresses the Neighbourhood Plan.

Yours sincerely

[redacted]

Colum Fitzsimons
Development and Policy Manager
Planning, Growth and Environment

Thriplow and Heathfield Neighbourhood Plan – Submission Plan May 2024: Response by Cambridgeshire County Council

Response By	Policy	Response/Comment
Transport Strategy Team	Issue 3: Transport and Connectivity	• The County Council is undertaking a multi-modal transport study of the Royston to Granta Park area. The objectives of the study have a strong focus on the environment with improvements to active travel, public transport and safety. Measures to reduce carbon emissions from transport would also be a key part of the development and detail of schemes and measures in the next stage of work. Recommendations on further work to develop more detailed proposals are due to be reported to committee in the autumn.
Active Travel Team	Theme 2: Living village and sustainable development Objective 10: A safer less congested parish. Objective 11: The quality and quantity of our rural footpath network and interconnectivity with neighbouring settlements will be improved.	• Access, via non-motorised (active travel) routes, to the surrounding countryside and neighbouring settlements will be improved, bringing with it, social, mental and physical health benefits. We support the vision that promotes active travel. • We support two themes in Objective 10 and 11. The plan highlights existing active travel routes and aims to enhance and expand them.
Active Travel Team	Policy THP 10 – Grain store site allocation Part 3) Connectivity and permeability	• Is there enough space for pedestrian and cycling routes along Lodge Road and Fowlmere Road?
Active Travel Team	Paragraph 6.12.6, page 90	• Have options been considered for creating a school street to stop vehicle access to the front of school at drop off and pick up, making the road a safer place to walk, wheel and cycle. Off road parking could be negotiated in the pub and village hall car parks. Additional options could be creating a walking or cycling bus from Heathfield to reduce drop offs in cars.

Response By	Policy	Response/Comment
Active Travel Team	Policy THP 13 - Protecting and improving our rural routes for nonmotorized users and creating sustainable connections to neighbouring settlements.	• The policies in the draft Thriplow and Heathfield Neighbourhood Plan should align with the Cambridgeshire's Active Travel Strategy and the Cambridgeshire's Active Travel Toolkit for New Developments
Active Travel Team	Paragraphs 4.6.13 and 4.6.14	• These issues (speeding and cut-through) are possibly related and a potential solution to both would be to introduce modal filters on the three main routes in and out of Thriplow to reduce the incentive to use the village as a short-cut. This is mentioned by a respondent to one of the surveys but does not appear to have been considered in the neighbourhood Plan.
Active Travel Team	Paragraph 4.6.7	• Have either solar studs or motion-activated lighting been considered? The former, while not improving feeling of security, do indicate path edges. The latter could also be solar powered and potentially be configured to light up ahead of a cyclist or pedestrian.
Climate Change and Energy Services	General Comments	• It would be useful to identify the main sources of carbon emissions in the Parish and work specifically to address these. Impact | Community carbon calculator (impact-tool.org.uk) is a good tool to get this information. • The document includes all the following phrases: "carbon neutral", "zero carbon", and "net zero carbon". Each of these terms have slightly different meanings when it comes to the target outcome for reducing carbon emissions. It would be advisable for the Parish to review these definitions and decide which one is most appropriate for the neighbourhood plan. • It is good to see community energy projects have been identified as an opportunity for the Parish.
Climate Change and Energy Services	Theme 2, Objective 8: All development to use sustainable building materials and consider energy efficiency	• It is good to see the Parish have accounted for life cycle assessments of all activities and materials.

Response By	Policy	Response/Comment
Climate Change and Energy Services	Policy THP 10 – Grain store site allocation Part 6) Sustainable design and construction	• This policy follows good guidance using the net zero carbon toolkit's energy hierarchy; however, maximising energy efficiency has not been included (although it is mentioned elsewhere in the document). The Parish could reword point ii) to include "incorporation of energy efficiency measures such as insulation and LED lighting, and low carbon heating solutions…" • Point ii) could also make specific reference to low carbon heat sources such as heat pumps as an alternative to gas and oil heating. • It is good to see support for renewable energy generation. This point could be strengthened further by the addition of specific mention of electric vehicle charge points. This could include supporting any applications for installation of such measures on existing buildings (in cases where planning permission is required) and requiring installation of such measures for construction of any new buildings.
Public Health	General Comments	• Having reviewed the Thriplow and Heathfield Neighbourhood Plan we support the plan's response to the identified key issues: 1. Separate communities 2. Access to amenities 3. Transport and connectivity 4. Natural environment 5. Village character 6. Housing needs 7. Biodiversity • The current severance between the two communities presents challenges to their wellbeing if the settlements are not served with suitable interconnectivity, local assets and facilities however the plan addresses these concerns and possible future approaches. • Public Health welcome the Community Initiatives as positive aspirations to improve the health and wellbeing of Thriplow and Heathfield.

200153 Comment

Document Element: Thriplow and Heathfield NP Submission version, Thriplow and Heathfield NP Submission 2024
Respondent: Environment Agency
Date received: 30/09/2024 via Email

Summary:

Please see attached our response.

Full text:

Thank you for consulting us on the submission plan for the Thriplow and Heathfield neighbourhood plan.
A key principle of the planning system is to promote sustainable development. Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time. To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and provide guidance on any actions you need to undertake. We also provide hyperlinks to where you can obtain further information and advice to help support your neighbourhood plan.
We note that the Local Plan for South Cambridgeshire is now older than 5 years and the Local Plan Review has yet to be undertaken. For this reason, we consider the Neighbourhood Plan to be higher risk and are keen to see the inclusion of relevant policy wording in the Neighbourhood Plan covering the environmental issues within our remit.
Ecology
We welcome the inclusion of policy THP8 and policy THP9. Protecting and enhancing the parish tributary feeding the Hoffer Brook
Please note, Cambridge Water have plans for river restoration of Hoffer Brook under the next round of the Water Industry National Environment Programme (WINEP) starting from 2025 onwards. Plans and discussions are currently underway with projects to be determined post-2025 – with delivery between 2025 until 2030, possibly 2035.
We would recommend guidance is sought from the Cam sub-catchment partnership – led by BCN Wildlife Trust – to gather further and more detailed information relating to potential projects and further enhancements.
Further enhancements provide by the Cam sub-catchment partnership include potential wetlands around Wastewater Treatment Works, spring restoration work, possible flood storage.
We would ask that the neighbourhood plan strongly considers and incorporates making space for water and allowing the river and its tributaries to interact / connect with its floodplain. This will allow the river to undertake natural processes, such as the removal of silt from in-channel to the deposition of silt out of channel within the floodplain during high flows. By making space for water and the incorporation of nature-based solutions, this could potentially reduce the future requirement for maintenance, prevent deterioration of the river's health, and aid its resilience to climate change.
We would recommend aligning restoration and protection measures with the CaBA Chalk Stream Restoration strategy – principally, the importance of restoring and enhancing all three aspects of the water environment - water quality, water quantity and habitat. The strategy highlights the importance of action within the headwaters of chalk streams, and this neighbourhood plan could be an excellent opportunity to incorporate them. More information is available here: Chalk Stream Strategy - CaBA (catchmentbasedapproach.org)
Site Allocation: Policy THP10
The Grainstore site allocation is located above a Principal Aquifer and 6.10.17 notes the possibility of contaminative historic use on the site. We would suggest that the final sentence is amended to remove "2023" – the planning application should be prepared in line with the current policy at the time of submission.
A site investigation and risk assessment will be required for any planning application. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: https://www.gov.uk/government/collections/groundwater-protection
Water Resources
Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.
New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.
Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk).

We hope this information is of assistance. If you have any queries, please do not hesitate to contact us.

Attachments:
EA Response Thriplow and Heathfield NP Submission 2024_JDI upload - https://cambridge.oc2.uk/a/3v6w9

Planning Policy Team
South Cambridgeshire District Council
South Cambridgeshire Hall (6010)
Cambourne
Cambridge
CB23 6EA

Our ref: AC/2024/132329/01-L01
Your ref:

Date: 30 September 2024

Dear Planning Policy Team

THRIPLOW AND HEATHFIELD NEIGHBOURHOOD PLAN – SUBMISSION PUBLIC CONSULTATION

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Cont/d..

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We hope this information is of assistance. If you have any queries, please do not hesitate to contact us.

Yours sincerely

Alison Craggs
Sustainable Places Planning Advisor

Direct dial 020 847 45242
Direct e-mail planning.EastAnglia@environment-agency.gov.uk

End