

Harston Neighbourhood Plan

Response to examiner's clarification note

Part 1 – response to examiner questions

Examiner question 1 (Policy HAR 4):

1. The fifth part of the policy reads as supporting text rather than as a land use policy.

1.1 I am minded to recommend that this part of the policy is relocated into the supporting text. Does the Parish Council have any comments on this proposition?

Parish Council response

1.2 If this change is needed for the Plan to meet the basic conditions, the Parish Council does not have a comment on this. The Parish Council does however wish to flag up that this clause was incorporated in light of feedback received from Cambridgeshire County Council at Regulation 14 stage – see Appendix 7 to the Consultation Statement.

1.3 The Parish Council also wishes to flag up that to address a comment made by South Cambridgeshire District Council (SCDC), it is proposing a change to Clause 1 to this policy and there is an opportunity to refer to below ground heritage assets in that amendment. See Part 2 'Parish Council comments on specific Regulation 16 representations'.

Examiner question 2 (Policy HAR 6)

2. The Button End Industrial Estate (as addressed in the second part of the policy) is defined on Map 9. Could the Plan also define the area to which the first part of the policy applies?

Parish Council response

2.1 Yes. This is done in the last sentence to supporting paragraph 6.58 in the submission Plan. The policy could helpfully be amended to include the same reference.

Examiner question 3 (Policy HAR 6 continued)

3. I understand the thinking behind the fifth part of the policy and experienced the road conditions in Button End first-hand. However, the wording of the policy may encourage development proposals which would conflict with Green Belt policy. I am minded to recommend its deletion. Does the Parish Council have any comments on this proposition?

Parish Council response

3.1 It is very important that the community's long established aspiration to see an overall reduction of traffic (particularly HGVs) using Button End lane is articulated clearly in the Plan. A part of this, is the inclusion of a policy statement that reflects

this. It is not the intention of Plan to question or undermine the Green Belt status of the land

3.2 It is felt there are different clauses in the policy, and indeed in other policies, and indeed in the NPPF, that would prevent inappropriate uses from coming forward on this site.

3.3 It is also felt that Clause 5 is particularly appropriate having regard to paragraph 15 in the NPPF that states up to date plans should 'provide a positive vision for the future of each area' as well as paragraph 29 and paragraph 109 that states 'transport issues should be considered from the earliest stage of plan-making and development proposals, using a vision-led approach to identify transport solutions...'

3.4 One option would be to amend the clause so it refers to policies needing to comply with national Green Belt policy, assuming this would not be deemed unnecessary duplication of policies that are already in place. For example:

Development proposals in Button End (including at Button End Industrial Estate) that result in an overall reduction in traffic movements (and that are otherwise compliant with other policies in this Plan, the Local Plan policies and with national Green Belt policy), including that of lorries and HGVs along Button End would be welcomed and are therefore, in principle, supported.

Examiner question 4 (Policy HAR 9)

4. This is a good policy which is underpinned by the Landscape Character Assessment. Given the content of Policy HAR 3, are sections 3 and 4 of the policy needed?

Parish Council response

4.1 The village views and landscape views are dealt with in separate policies intentionally. They deal with different characteristics. The village views have close association with the settlement. In the main, they are connected to small ancient enclosure fields with historic boundaries close to the village (identified as important open land) so although they make up the Green Belt it is how they make it up e.g. small ancient fields with hedgerow boundaries that enclose views that give it its importance/character as opposed to large wide open arable fields.

4.2 To avoid confusion with regards the views, we suggest the policies are amended so that the specific views dealt with in each policy are listed. To be clear, the village views dealt with in Policy HAR 3 are A,B,C/D,E,J,K and the wide landscape views, dealt with in Policy HAR 9 are F,G,H,L,M,N.

4.3 To illustrate this, Clause 3 in Policy HAR 9 could be amended as follows:

Preserving and enhancing Harston's locally important wider landscape views

Development proposals will be expected to respect and not adversely impact on Harston's wider landscape views (Views F,G, H, L, M and N) as shown on Map 6, and described in detail in Appendix 4.

4.4 To be consistent with the above proposed change, Clause 2 in Policy HAR 3 should also be amended as follows:

Preserving and enhancing Harston's locally important village views

2. Development proposals will be expected to respect and not adversely impact on the key features of Harston's locally important village views within and from the settlement. The locally valued village views for the purpose of this policy are Views A, B, C/D, E, J and K. These are shown on Map 6, and described in detail in Appendix 4

Examiner question (Policy HAR 10)

5. Could the second part of the policy be relocated in the supporting text as it restates national policy?

Parish Council response

5.1 If this change is necessary for the policy to meet the basic conditions then the Parish Council has no comment on this.

Examiner question (Policy HAR 11)

6. The policy takes a positive and non-prescriptive approach towards sustainable design and construction.

6.1 I am minded to recommend that the second part of the policy is applied in a proportionate way. Does the Parish Council have any comments on this proposition?

Parish Council response

6.2 The Parish Council agrees the policy should be applied in a proportionate way to the size of the development/extension.

Examiner question (Policy HAR 12)

7. Is the reference in the first part of the policy to the delivery of community benefits necessary given the broader benefits of low-carbon development proposals?

Parish Council response

7.1 Paragraph 168 b) in the NPPF 2024 states that local planning authorities should recognise that small scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions. Many community-led projects are community-led because they deliver tangible benefits to the community in addition to lowering carbon demand. The scenarios set out in supporting paragraph 9.29 (in the submission Harston NP) include examples (see A, B, C and E) where this is the case. So, in the case of the Gamlingay Wind Turbine, part of the profit from the turbine's operation is used to provide income to the village to spend on local charities and community projects <https://g-c-t.uk/>

7.2 Subject to a successful examination and a successful referendum (the outcome of which should never be taken for granted), the Harston Neighbourhood Plan will become part of the statutory development plan and it will also itself be a community-led plan.

7.3 In light of this and in light of paragraph 168 b) in the NPPF 2024, the wording in Policy HAR 12 is very appropriate and should remain.

Examiner question (Policy HAR 14)

8. Does this policy bring any added parish value beyond national and local planning policies?

Parish Council response

8.1 Yes. The policy demonstrates that within Harston parish, there is in principle support for affordable housing being delivered via a rural exception site. This is something that cannot be reflected in local or national policy.

8.2 It should be noted here that Harston Parish Council has been very proactive in building the evidence around parish-specific needs for affordable housing (see Harston Housing Needs Survey 2024) and, alongside the NP, is being proactive by working alongside stakeholders in seeking an appropriate site for the delivery of a rural exception site.

8.3 Clause 1 in Policy H/11 of South Cambridgeshire Local Plan 2018 (Chapter 7: Rural Exception Site Affordable Housing) is written below. Policy HAR 14 adds to this context by clarifying that proposals would need to meet identified need in the **Harston** plan area. It also adds to this context by requiring that qualifying proposals in Harston would need to contribute positively to the existing character of Harston village and in its setting in terms of design, layout, materials, landscaping and biodiversity.

“Affordable housing developments to meet identified local housing needs on small sites adjoining a development framework boundary will be permitted subject to:

a. The number, size, design, mix and tenure of affordable homes are confined to, and appropriate to, meeting identified local needs;

b. The development is of a scale and location appropriate to the size, facilities and character of the settlement;

c. For sites at settlements within or adjoining the Green Belt, that no alternative sites exist that would have less impact on Green Belt purposes;

d. That the affordable homes are secured for occupation by those in housing need in perpetuity. Mortgagee in Possession clauses will be allowed where demonstrated to be necessary to enable development to proceed.

Examiner question (Policy HAR 15)

9. The first part of the policy takes an appropriate and balanced approach.

9.1 The second part of the policy acknowledges that small schemes may struggle to meet the mathematical requirements of the policy. In this context what is meant by ‘schemes large enough to include a mix in terms of size and/or tenure’?

Parish Council response

9.2 A scheme of five or more dwellings is considered capable of including a mix of sizes and affordable housing will only be required on schemes of 10 or more. To address the issues around meeting mathematical requirements, it is suggested the

policy could helpfully be amended through the insertion of “approximately” in front of the percentage figures. To illustrate:

In terms of size (market and affordable), at least 60% of new dwellings to be 3-bedroom units and approximately 36% to be 2 bedroom units.

Examiner question (Policy HAR 15 continued)

10. Has the policy’s requirement for a 50% discount for First Homes been assessed for its potential impact on commercial viability?

Parish Council response

10.1 No. Viability work has not been undertaken. However, as illustrated in Table 4-4 in the Harston Housing Needs Assessment, First Homes are unlikely to be affordable to those on average incomes or lower incomes in the Plan area.

10.2 Therefore, were First Homes to be delivered they should be delivered at the maximum discount rate for them to have any effect in terms of addressing existing affordable housing needs. On this point, it is noted that whilst the Affordable Homes Update Written Ministerial Statement published on 24 May 2021 still applies, the 25% minimum delivery requirement for First Homes no longer applies. In South Cambridgeshire district, First Homes, as a product, have not proved to be successful and the Parish Council’s understanding is that the product is not favoured by local authority.

10.3 The reference to First Homes is included in the policy to reflect the government’s position on First Homes, whilst also ensuring that where they are being delivered the product is catered to accommodate affordability thresholds applicable to Harston.

10.4 To account for viability issues that could occur, the Parish Council suggests the following amendment for consideration:

- *25% affordable home ownership. Where First Homes are included in the mix, they should be delivered at a 50% discount, unless evidence is provided that a lower discount rate is needed for the purpose of delivering a viable product and it is evidenced that the product would be affordable for eligible local households.*

Examiner question (Policy HAR 16)

11. Does the first part of the policy bring any added parish value beyond national and local planning policies?

Parish Council response

11.1 Harston is located on and is divided by a key route into the City of Cambridge.

11.2 This policy is primarily a response to the existing conflicts that arise between different users on the highway along the A10 as well as along Church Street. Along the A10, there are specific issues relating to the number of motorised vehicles crossing the designated off-road cycle route. This includes the number of delivery vehicles and associated frequency of on-pavement short stops. It is felt the frequency of road user conflict and safety concerns around this is overlooked at the planning

application stage, including by Highways. Such planning applications may involve the creation of new development that require direct access off the A10, including in locations that are opposite existing road junctions on to the A10.

11.3 The intention underpinning Policy HAR 16 is that all the everyday hazards (associated with the full range of road users) are fully considered so they can then be addressed and appropriately mitigated, or where they cannot, be refused.

11.4 Clause 1, together with the context provided in the supporting paragraph (e.g. paragraph 11.6, Appendix 7) adds additionality to national and local planning policies.

Examiner question (Policy HAR 17)

12. I noted the traffic issues in Church Street during the visit.

12.1 On the one hand, the intentions of the policy are clear. However, on the other hand, the policy appears to apply the generalities of national and local planning policies on traffic movements to a specific part of the parish. In this context, it would be helpful if the Parish Council elaborated on its intentions and the extent to which a specific policy is needed.

Parish Council response

12.2 The number and type of vehicular movements in and out of Button End industrial estate is having not only an impact on Button End itself but also along Church Street. Policy HAR 17 will ensure these issues will not be overlooked as part of future planning applications. The policy is included to ensure that the issues are identified and addressed; and mitigated as appropriate for the purpose of dealing with future planning applications.

12.3 Development in other locations including along and close to Church Street will also have a direct impact upon the number and type of vehicles using Church Street.

12.4 Policy HAR 17 is included to ensure the existing well-established and well-evidenced issues around Church Street are taken into account when applicable planning applications come forward. This is not happening under the existing suite of Local Plan and national planning policies – see two examples below. This is why the Harston NP has sought to identify appropriate measures – see paragraph 11.26. It is also why Policy HAR 19 is included – the policy that safeguards open space located in the heart of Harston’s historic core for the purpose of accommodating on-street parking issues that have so far been inadequately addressed through past planning decisions.

12.5 For example:

- the expansion of the doctor’s surgery on Church Street. The position of the Parish Council and that of residents is that the knock on impacts for on-street parking demand as well as the knock on impact for incidents of inconsiderate and unsafe on-street parking had not been fully considered and therefore not adequately mitigated as part of the consented scheme that resulted in the expansion of the doctor’s surgery. The Travel Plan submitted as part of the discharging of consent (that focused on staff travel rather than patient travel)

addresses the challenge of accommodating the needs of 16 on-site staff members with a restriction of 8 spaces available for staff.

- planning consent granted for 9 additional dwellings on the site of Beech Farm, located on the northern side of Church Street with dwellings to use an existing access road adjacent to 34 Church Street. In this case, the Parish Council view is that neither the County Council response (in its capacity as Highways), nor the planning officer considered the impact of the scheme against the context of existing highways issues along Church Street. Without impacts being identified or assessed there is no scope for development to be appropriately mitigated through the planning system.

12.6 The problems along Church Street are described in supporting paragraphs 11.22 to 11.25 and paragraph 11.26 sets out the range of measures that could alleviate the existing issues.

12.7 Should further development proposals come forward that will result in issues along Church Street being exacerbated, it simply makes sense that work should be undertaken to explore and better understand those issues and that wherever applicable applicants be required to incorporate mitigation. Without Policy HAR 17 being in place, it is feared there will be no policy hook for this to happen and the problems will continue to perpetuate.

12.8 The Parish Council suggests the following additions to Clause 1 to help strengthen the value of Policy HAR 17 against the context provided by national and local plan policies:

Where a development proposal in the plan area has potential to lead to adverse traffic related implications along Church Street, the proposals will be required to be assessed in terms of its likely impact on road safety and residential amenity along Church Street (a narrow sinuous route, with narrow pavements and with no space for widening. It has insufficient width for large commercial vehicles who in practice have to mount the pavement to pass other vehicles). This will apply to all proposals requiring highways access on to Church Street as well as proposals in other parts of the plan area (such as Button End) likely to generate movement of HGVs along Church Street. To be supported, development proposals must either:

12.9 Please also note that in response to SCDC's comment on this policy we have suggested minor amendments to Clause 2 in this policy.

Examiner question (Policy HAR 20):

13. I looked at the Telephone exchange site carefully during the visit. I noted its relationship to the Village Hall to the west and to the surrounding houses.

13.1 For clarity, does the final sentence of the policy support proposals for the redevelopment of the site as a car park, or other proposals which would help to deliver that objective?

13.2 How would any such car park be delivered and managed? Would it effectively provide an extended Village Hall car park?

Parish Council response:

13.3 The final sentence is intended to mean proposals that support the redevelopment of the site as a public car park would be supported.

13.4 The Parish Council wishes to emphasize at this point that the Village Hall car park is not owned by the Parish Council and it is not a public car park open to use by people other than those using the village hall.

13.5 This is an aspirational policy. The Parish Council aspiration is that the land identified as part of Policy HAR 20 would be owned by the Parish Council. The site is ideally located for such a use and would help address road safety issues associated by unsafe on street parking along the A10/High Street.

13.6 To improve clarity, the Parish Council suggest the following amendment to the Policy:

In the event that it is not needed for its current use, land at the existing telephone exchange site (see Map 16) is identified as a suitable location for future provision of a public car park, to be accessed off the High Street. ~~Development proposals that help deliver this will, in principle, be supported.~~

A development proposal that delivers the car park will, in principle, be supported.

Examiner question (Policy HAR 21)

14. I note the Aspirations listed in the third part of the policy. Three questions arise:

14.1 Is it likely that the aspirations will be delivered in the Plan period?

Parish Council response

14.2 Yes, the Parish Council has already spoken to landowners involved as well as the Cambridgeshire County Council (CCC) Active travel team.

14.3 The CCC Active Travel Strategy is available to view at the link below. It includes a vision of a connective active travel network and identifies Tier 1 routes and Tier 2 routes. Tier 1 routes includes those with identified funding or those that are being delivered through development. Tier 2 routes show additional active travel routes that include known routes as well as new schemes (not yet funded) that together will support the creation of a wider, connective active travel network. Both Tier 1 and Tier 2 routes comprise the start of a high-level vision for a connected active travel network across Cambridgeshire and for South Cambridgeshire is illustrated on Figure 13 in the strategy.

www.cambridgeshire.gov.uk/asset-library/Cambridgeshires-Active-Travel-Strategy-Adopted-March-2023.pdf

14.4 For route 1, the Parish Council has spoken to CCC's Active Travel Team and the route appears in their vision as a Tier 2 route.

14.5 For route 2, the Parish Council has spoken to Thriplow Farms (the landowner) and the tenant farmer. Here the delivery may be long term and it is also noted that if EWR goes ahead, EWR may provide an alternative link. The Parish Council has also

been engaged in discussions with the Ramblers group on more potential routes being made available.

14.6 For route 3, the applicable stakeholder would be CCC. We also note that if East West Rail is consented, EWR have stated in its response that it would deliver this route where it affects it.

14.7 For routes 4 & 5, the Parish Council has spoken to landowner W Hurrell.

14.8 For route 6, the Parish Council has spoken to the CCC Greenways team

14.9 For routes 7 & 8, the Parish Council has spoken to Jesus College.

Examiner question (Policy HAR 21 continued)

15. What type of proposals might deliver such aspirations?

Parish Council response

15.1 The delivery of the aspirations could be outside the planning system, for example through cooperation and agreement with landowners, together with the provision of funds. But were a development proposal to come forward where an opportunity arose to deliver an aspired-to improvement, the proposals will be expected to deliver it. The most obvious scenario would be if a development proposal came forward that involved land where an aspired-to route were located. The most common scenario however would be where a development proposal were to come forward that would adversely impact on a route or lead to an increased demand for outdoor recreational demand; that could trigger a requirement towards maintenance or enhancement.

Examiner question (Policy HAR 21 continued)

16. Is there a potential risk that a development proposal may incorporate such aspirations but otherwise conflict with development plan policies?

Parish Council response

16.1 This risk is recognised and to be clear, it is **not the intention** of Policy HAR 21 to support development proposal that would otherwise conflict with policies in the statutory development plan (the Local Plan, together with the Neighbourhood Plan). To provide clarity on this point, the Parish Council proposes a necessary change as follows:

Clause 1 to be amended as follows:

Maintaining and enhancing the existing rural footpath network.

*The existing network of rural routes, comprising both Public Rights of Way and the network of permissive routes, shown on Maps 17 and 18, providing important outdoor recreational opportunities and providing active travel links into neighbouring settlements of Barrington, Haslingfield, Hauxton and Newton will be protected or enhanced. Where opportunities arise to create new links into the existing network, proposals will be expected to do so, **having regard to the aspirations described in the supporting text and shown on Map 18.***

Clause 3 to be amended as follows:

Development proposals that will help achieve the parish-wide aspirations listed below, described in the supporting text and shown on Map 18, will be supported, subject to the proposal otherwise complying with provisions in the Local Plan and this neighbourhood plan.

Examiner question (Policy HAR 24)

17. I note the issues about the numbers of children attending the school in paragraph 13.13. However, should the resulting policy be more general, rather than directly commenting about housing which is targeted at younger families given that younger families may not occupy such homes and/or send children to the school?

Parish Council response:

17.1 The policy makes specific mention of housing because it is considered that occupants of more affordable housing are more likely to include children who then attend the local school and in recognition of the fact that expensive housing is a key barrier to local families being able to stay in the village.

Examiner question (Policy HAR 27)

18. I looked carefully at the site during the visit. I note its overlap with Policy HAR24. For consistency, I suggest that the reference to Policy HAR24 is removed. Does the Parish Council have any comments on this proposition?

Parish Council response

18.1 The Parish Council is happy with this approach, noting its position is already made clear through supporting paragraph 14.9

Examiner question (Policy HAR 27 continued)

19. I am also minded to include an additional element within the policy to safeguard the East West rail route. Does the Parish Council have any comments on this proposition?

Parish Council response

19.1 The Parish Council suggests a link is added to show the maps with the safeguarded areas for EWR route options 1 and their preferred option 4 but as the development consent order is not yet confirmed, the inclusion of a map may not be appropriate at this stage.

19.2 Additionally, if needed, the information in Appendix 8 to the submission NP could be amended to show the area of safeguarded land relevant to HAR27 on Map (as shown in EWR response).

Examiner question (Policy HAR 27 continued)

19.3 I note the commentary in paragraphs 14.9 and 14.10 about the location of the site in the Green Belt and the determination of a planning application some years ago. However, the policy itself simply restates national policy on the Green Belt. Did the Parish Council consider including further details about the number of homes that would be appropriate for the site, their height and massing, and the layout of the site (both generally and in response to the Planning Inspector's decision on the earlier proposal)?

Parish Council response

19.4 If the East West Rail development consent order is granted, there is a possibility that some of the land shown on Map 20 will be needed as part of the confirmed safeguarding order. The number of homes will also be restricted by the presence of the railway.

19.5 Given the information set out in the previous proposal, there could be capacity for approximately 10 dwellings (16 minus 4 to account for EWR if EWR goes ahead). Exact numbers and design and landscaping requirements would depend on whether the East West Rail DCO is granted.