

Thriplow and Heathfield Neighbourhood Development Plan 2024-2041

**A report to South Cambridgeshire District Council
on the Thriplow and Heathfield Neighbourhood Plan**

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Executive Summary

- 1 I was appointed by South Cambridgeshire District Council in October 2024 to carry out the independent examination of the Thriplow and Heathfield Neighbourhood Development Plan.
- 2 I visited the neighbourhood area on 25 October 2024. The examination was undertaken by written representations.
- 3 The Plan includes a range of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on safeguarding local character and ensuring that the Green Belt is respected.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been actively engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Thriplow and Heathfield Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum area should coincide with the neighbourhood area.

Andrew Ashcroft
Independent Examiner
17 February 2025

1 Introduction

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

2 The Role of the Independent Examiner

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

Examination Outcomes

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

Other examination matters

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

- 2.7 I have addressed the matters identified in paragraph 2.6 of this report. I am satisfied that the submitted Plan complies with the three requirements.

3 Procedural Matters

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

- the submitted Plan;
- the Basic Conditions Statement;
- the Consultation Statement;
- the SCDL SEA/HRA Screening Determination Statement;
- the Environmental Report;
- the Heathfield Masterplan;
- the Housing Needs Survey;
- the Grain Store concept;
- the Landscape Character Assessment;
- the Open Spaces Assessment;
- the Site Assessments;
- the Site Selection Landscape and Visual Sensitivity;
- THPC's responses to the Clarification Note;
- the representations made to the Plan;
- the adopted South Cambridgeshire Local Plan;
- the National Planning Policy Framework (NPPF) - December 2023 and December 2024;
- Planning Practice Guidance; and
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 25 October 2024. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. The visit is covered in more detail in paragraphs 5.9 to 5.15 of this report.

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

The 2024 update of the NPPF

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

- 3.5 On this basis, the examination of the Plan against the basic condition that it should have regard to national policies and advice contained in guidance issued by the Secretary of State is based on the 2023 version of the NPPF. Plainly the Plan was submitted in 2024 in that context. Where NPPF paragraph numbers are used in this report, they refer to those in the December 2023 version.
- 3.6 Paragraph 6.2 of this report sets out the full extent of the basic conditions against which a neighbourhood plan is examined.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such, the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012, THPC prepared a Consultation Statement. The Statement sets out the mechanisms that were used to engage the community and statutory bodies in the plan-making process. It also provides specific details about the consultation process that took place on the pre-submission version of the Plan (January to March 2023). It captures the key issues in a proportionate way and is underpinned by more detailed appendices.
- 4.3 The Statement is particularly helpful in the way in which it reproduces elements of the consultation documents used throughout the plan-making process. Their inclusion adds life and depth to the document.
- 4.4 The Statement sets out details of the comprehensive range of consultation events that were carried out in relation to the initial stages of the Plan. They are arranged into the phases of the Plan as follows:
- the inception stage (Section 3);
 - the initial plan development stage (Section 4);
 - the advanced plan development stage (Section 5); and
 - the pre-submission stage (Section 6).
- 4.5 I am satisfied that the engagement process was both proportionate and robust. In many instances, the ways in which the Parish Council engaged the community and statutory bodies was extremely thorough and detailed.
- 4.6 Appendix 3 of the Statement provides details on the comments received on the pre-submission version of the Plan. Appendix 4 identifies the principal changes that worked their way through into the submission version. These details help to describe the evolution of the Plan.
- 4.7 Consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation.

- 4.8 From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. SCDC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Representations Received

- 4.9 Consultation on the submitted plan was undertaken by SCDC that ended on 30 September 2024. This exercise generated comments from a range of organisations as follows:

- Anglian Water Services Limited
- British Horse Society
- Cambridgeshire Constabulary
- Cambridgeshire County Council
- Defence Infrastructure Organisation
- Environment Agency
- Forestry Commission
- Historic England
- Linton Parish Council
- National Grid
- National Highways
- Natural England
- Sport England
- South Cambridgeshire District Council

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

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area consists of the parish of Thriplow and Heathfield. It is 10 km north-east of Royston and 11 km south-west of Cambridge. It has good accessibility to the A505 and its junction with the M11. Its population in 2011 was 1164 persons living in 501 houses. It was designated as a neighbourhood area on 25 August 2017.
- 5.2 As the Plan describes, the parish consists of two main separate settlements. The first is Thriplow which is a traditional historic village. The second is Heathfield, which was originally the married quarters serving RAF Duxford. Heathfield lies to the south-east of Thriplow alongside the A505. Thriplow village is enveloped by the Cambridge Green Belt and Heathfield is bounded by the Cambridge Green Belt to the north, north-east, south-west and west. Most of the wider countryside also falls in the Green Belt other than the triangular shaped area of land located to the southern part of the A505.
- 5.3 Thriplow character relates to its circular pattern of roads, its variety of open views, and wooded views. The combination of the position of the houses, their various ages, and large proportion of listed buildings also contribute to the character. Most of the village is a conservation area. Heathfield is located opposite the Duxford Imperial War Museum (formerly RAF Duxford) on the A505 about a mile to the south of Thriplow village. The airfield started in 1917/18. Housing built for RAF staff based at Duxford was developed in the 1920s. Since 1990 three new private residential developments (Pepperslade, Hurdles Way and Ringstone) have been built to the east and west of the estate, which have more than doubled the original size of the settlement. In the round the neighbourhood area presents an interesting backcloth for the preparation of a neighbourhood plan.

Development Plan Context

- 5.4 The development plan covering the neighbourhood area is the South Cambridgeshire Local Plan. It was adopted in 2018 and covers the period up to 2031. Policy S/6 (The Development Strategy) focuses new development on the edge of Cambridge, at new settlements and, in the rural areas at Rural Centres and Minor Rural Centres.
- 5.5 Policy S/10 identifies a series of Group Villages, including Thriplow. The policy advises that residential development and redevelopment up to an indicative maximum scheme size of eight dwellings will be permitted within the development frameworks of Group Villages. The policy also advises that development may exceptionally consist of up to about 15 dwellings where this

would make the best use of a single brownfield site. The development framework of Thriplow is shown on Inset Map 102.

- 5.6 Policy S/11 identifies a series of Infill Villages, including Heathfield. The policy advises that residential development and redevelopment within the development frameworks of these villages will be restricted to scheme sizes of not more than two dwellings (subject to a series of criteria). The development framework of Heathfield is shown on Inset Map 54.
- 5.7 In addition, the following policies in the Local Plan have been particularly important in influencing and underpinning the various policies in the submitted Plan:

Policy S/4 Green Belt
 Policy HQ/1 Design Principles
 Policy NH/14 Heritage Assets
 Policy H/10 Affordable Housing
 Policy H/18 Working at Home
 Policy E/16 Expansion of Existing Businesses in the Countryside
 Policy E/19 Tourist Facilities and Visitor Attractions
 Policy SC/3 Protection of Village Services and Facilities
 Policy SC/4 Meeting Community Needs
 Policy SC/7 Outdoor Play Space, Informal Open Space and New Developments
 Policy SC/8 Protection of Existing Recreation Areas

- 5.8 The submitted Plan has been prepared within its wider adopted development plan context. In doing so, it has relied on up-to-date information and research that has underpinned existing planning policy documents in the District. This is good practice and reflects key elements in Planning Practice Guidance on this matter. It is also clear that the submitted Plan seeks to add value to the different components of the development plan and to give a local dimension to the delivery of its policies. This is captured in the Basic Conditions Statement.

Unaccompanied Visit

- 5.9 I visited the neighbourhood area on 25 October 2024. I approached from the A505 to the south. This allowed me to understand its setting in the wider landscape and its proximity to the main road network.
- 5.10 I looked initially at the proposed grain store allocation in Thriplow. I saw its relationship to the village (and the recreation ground) to the east and to the surrounding countryside.

- 5.11 I then looked at Thriplow village. Its interesting character and layout were self-evident. I walked around the loop from School Lane to Church Street to Middle Street. In doing so I saw the significance of the village shop, the school, and the Church of St George. I also saw the various historic buildings. I looked carefully at the two proposed Important Countryside Frontages.
- 5.12 I then drove to Heathfield. I noted its proximity to the Imperial War Museum at Duxford. I noted that it had a very different character to that of Thriplow based on its historic associated with the former RAF Duxford.
- 5.13 I looked carefully at the proposed Local Green Spaces in Heathfield. I saw their obvious importance to the local community.
- 5.14 I also saw the range of employment buildings off Woburn Place.
- 5.15 I left the parish along on the A505 and drove up to the M11. This highlighted the strategic location of the parish adjacent to the national highway network.

6 The Neighbourhood Plan and the Basic Conditions

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped considerably in the preparation of this section of the report. It is a well-presented and informative document. It is also proportionate to the Plan itself.

6.2 As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

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

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

National Planning Policies and Guidance

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

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

- a plan led system– in this case the relationship between the neighbourhood plan and the adopted South Cambridgeshire Local Plan;
- delivering a sufficient supply of homes;
- building a strong, competitive economy;

- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

- 6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.
- 6.7 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.
- 6.8 Having considered all the evidence and representations available as part of the examination I am satisfied that subject to the recommended modifications in this report that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a positive vision for the future of the neighbourhood area within the context of its status within the development strategy in the Local Plan and the scale and nature of the Cambridge Green Belt. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.
- 6.9 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This is reinforced in Planning Practice. Paragraph ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.
- 6.10 As submitted the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to Sustainable Development

- 6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for the rural economy (Policy THP6), and for the allocation of the grain store site in Thriplow (Policy THP10). In the social dimension, it includes policies on additional facilities in Heathfield (Policy THP2), and on local green spaces (Policy THP7). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It includes policies on the character of the two settlements (Policies THP1 and 3), on Important Countryside Frontages (Policy THP4), and on locally valued views (Policy THP5). THPC has undertaken its own assessment of this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.12 I have already commented in detail on the development plan context in South Cambridgeshire in paragraphs 5.4 to 5.8 of this report.
- 6.13 I consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to policies in the development plan. Subject to the incorporation of the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.14 The Neighbourhood Plan General Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.15 In order to comply with this requirement SCDC prepared a Screening Assessment in June 2022. The report is thorough and well-constructed. It makes the following conclusions:

'The Plan allocates land for development purposes outside the existing development framework established within the adopted South Cambridgeshire Local Plan. Furthermore, the adopted Local Plan does not allocate the site in the first instance and does not provide a housing requirement for the Plan area. The Local Plan sets an indicative maximum limit of 15 dwellings for

proposals within Group Villages. This yield is surpassed by the Neighbourhood Plan's allocation.

Although the Local Plan adopts a flexible approach to proposals on previously developed land, which the Neighbourhood Plan allocation is, it is considered that the procedure of exploring 'reasonable alternatives' within the context of the SEA Directive should be followed in order to meet the basic condition regarding compatibility with certain Obligations (basic condition 'f').

The Thriplow Neighbourhood Plan can therefore be screened in for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC.'

- 6.16 On this basis THPC commissioned an Environmental Report. It was published in May 2024. The report is thorough and comprehensive. It explains how reasonable alternatives were established after the process of considering the strategic policy context ('top down' factors) and the site options in contention for allocation ('bottom-up' factors). This work identified that whilst there is no strategic need to deliver new homes in Thriplow and Heathfield, there is a desire to meet locally identified needs for new affordable homes. Four reasonable options/ sites were identified that could potentially contribute to meeting those needs and five options/sites have been discounted as 'unreasonable' due to their location within the Green Belt.

- 6.17 The report draws the following conclusions:

'Significant long-term positive effects are considered likely in relation to community wellbeing, due to the plan bringing forward additional dwellings and improvements and enhancements to existing community and public realm features.

Minor long-term positive effects are considered likely in relation to biodiversity and geodiversity, land, soil and water resources, and landscape through design stipulations under the site allocation policy that ensure important features within the site and in proximity are fully considered in the site design and incorporated and enhanced through development. Biodiversity and geodiversity, the historic environment and land, soil and water resources are also considered through wider plan policies that work to protect and enhance sites and features of value, which improves the setting and quality of the neighbourhood area and designated features. Minor long-term positive effects are also considered likely for transportation and movement through allocating a site close to sustainable and active transportation provision and boosting connectivity, safeguarding rights of way, and providing additional parking.

Neutral effects (i.e., no significant deviations from the baseline) are considered likely in relation to climate change and flood risk, and the historic

environment. In relation to climate change, whilst development could result in increased emissions, the site allocation policy and wider plan policies work to reduce per capita emissions, include renewable energy infrastructure, and retain and enhance biodiversity. In relation to the historic environment the proposed policy mitigation should ensure residual effects are broadly neutral, however, it is recognised that there remains an element of uncertainty in the absence of detailed design proposals and mitigation strategies.'

Habitats Regulations Assessment

- 6.18 The screening report also undertook a Habitats Regulations Assessment (HRA) of the Plan. It is equally thorough on this matter. It advises as follows:

'The HRA screening report identified that, without mitigation, further consideration was required at the Appropriate Assessment stage to determine whether the Thriplow Neighbourhood Plan either alone or in-combination with other plans and projects, would adversely affect the integrity of Eversden and Wimpole Woods SAC as a result of impacts on protected species outside the protected sites potential impact pathway, i.e. this HRA recommended that policies supporting development should be assessed further due to insufficient information regarding mitigation measures for significant impacts on hedgerows or any severance of Barbastelle bat flightlines from the Plan alone or in-combination with other plans and projects.

In applying the HRA Stage 2 (the integrity test at the AA stage), based on the parish being within the 10km sustenance or wider conservation area for Eversden and Wimpole Woods SAC, mitigation needs to be embedded in the Plan in relation to impacts on protected species outside of the protected sites from the Neighbourhood Plan alone. Therefore, this HRA has recommended that the policy text is altered for Policies THP 6, THP 11, THP 14, THP15 and THP 16. Alternatively, a separate policy relating to 'mitigating the impact of development on Eversden and Wimpole Woods SAC' could be provided within an updated draft of the Thriplow Neighbourhood Plan.

Embedded mitigation measures for projects (planning applications) will need to be considered in project level HRA/AA reports assessed by SCDC and secured by a condition attached to any planning consent. Therefore, there will be no need for further assessment for this Neighbourhood Plan.

Subject to the above recommendations being incorporated this HRA Screening Report including Appropriate Assessment, indicates that, with mitigation embedded, the Thriplow Neighbourhood Plan is not predicted to have an Adverse Effect on the Integrity of any Habitats site, either alone or in combination with other plans and projects. The requirement for the Plan to

undertake further assessment under the Conservation of Habitats and Regulations 2017 (as amended) is therefore screened out.'

- 6.19 This approach provides assurance to all concerned that the submitted Plan takes appropriate account of important ecological and biodiversity matters. I comment on the affected policies in Section 7 of this report.
- 6.20 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood planning obligations.

Human Rights

- 6.21 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. In addition, there has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. Based on all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

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

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and THPC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has three important elements. The first is the way in which several of the policies are directly underpinned by technical Appraisals. The second is its clear and attractive presentation. The structure of the Plan and its policies is very understandable and the use of colour and well-chosen photographs makes the document very attractive and user-friendly. The third is that the supporting text of each policy includes a Policy Intent which explains its purpose.
- 7.5 The Plan has been designed to reflect Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land. It also includes a series of Community Initiatives.
- 7.6 I have addressed the policies in the order that they appear in the submitted Plan. The Initiatives are addressed thereafter.
- 7.7 For clarity, this section of the report comments on all the Plan's policies.
- 7.8 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

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

- 7.8 The Plan is very well-organised and presented. It has been prepared with much attention to detail and local pride. It makes an appropriate distinction between the policies and their supporting text. The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.

- 7.9 The Introduction (Section 1) comments about the neighbourhood plan agenda in general and identifies the neighbourhood area (in Map 1) and the Plan period (in paragraph 1.1). It comments about the status of the Plan.
- 7.10 Section 2 provides information about the neighbourhood area. The interesting and comprehensive details help to set the scene for the policies.
- 7.11 Section 3 comments about the way in which the community and stakeholders were engaged in the process. It overlaps with the details in the Consultation Statement.
- 7.12 Section 4 comments about seven key issues which stemmed from work on a SWOT analysis of the parish.
- 7.13 Section 5 comments about the vision, themes, and objectives of the Plan. The Vision neatly summarises the ambition for the parish as follows:
- ‘Thriplow and Heathfield will grow sustainably whilst remaining a ‘living’ community providing a high quality of life and social cohesion for residents of all ages across the whole parish, respecting its rural roots and enhancing the natural environment. Access, via non-motorised (active-travel) routes, to our surrounding countryside and neighbouring settlements will be improved, bringing with it social, mental health and physical health benefits.’*
- 7.14 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.6 to 7.8 of this report.

Policy THP 1 – Improving the character and quality of Heathfield

- 7.15 The Plan advises that the purpose of the policy is to ensure that new development within Heathfield meets high design standards and to ensure that the existing challenges at Heathfield are not used as an excuse for poor standards of design in any future development. The policy also requires proposals to implement available opportunities for improving the overall character, quality, and cohesiveness of Heathfield. The Plan advises that this approach will apply on a proportionate basis and minor householder application schemes which otherwise are policy compliant will not be expected to contribute.
- 7.16 The extensive supporting text comments about the circumstances in Heathfield which the Plan is seeking to address.
- 7.17 In general terms, the policy takes a positive approach towards improving the character and quality of Heathfield. However, to bring the clarity required by the NPPF and to address the specific points raised by SCDC, I recommend the following package of modifications:

- an explicit reference to Heathfield in the policy;
- the combination of the first and second parts of the policy;
- the inclusion of an additional element on trees into the submitted second part of the policy;
- the deletion of the third part of the policy. It is supporting text and is already addressed in paragraph 6.1.39; and
- the recasting of other elements of the policy.

7.18 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace the policy with:

‘Development proposals in Heathfield should achieve high quality design and a good standard of amenity for all existing and future occupants of land and building. This includes:

- **retaining existing landscape features that have amenity or ecological value and taking opportunities to incorporate new landscape features such as trees and hedgerows, particularly where this will have public amenity value;**
- **the retention of existing trees within a proposed development site unless information is provided to the standards of BS5837: Arboricultural Impact Assessment to justify that their condition does not justify retention within the proposal; and**
- **ensuring there is a high quality of architectural design and landscaping on any frontage to a public space, including residential streets and open spaces**

As appropriate to their scale, nature, and location development proposals in Heathfield, or which otherwise impact on the residential areas in Heathfield, should take available opportunities to improve the character, quality and cohesiveness of the area and the way it functions.

Where it is necessary to deliver sustainable development, and where it directly, fairly, and reasonably relates in scale and kind to the proposed development, off-site contributions will be secured from development proposals to achieve improvements set out in the Heathfield Enhancement Strategy.’

Policy THP 2 - Provision of additional amenities in Heathfield

7.19 The Plan advises that this is an aspirational policy which supports in principle development proposals for a new community meeting space or community facility such as a shop or sports facility. The Plan acknowledges that such opportunities are limited given the Green Belt designation and Heathfield not

being considered a suitable location for additional residential development other than appropriate and sensitively designed infill schemes.

- 7.20 I have considered THPC's response to the clarification note and the comments from SCDC very carefully. On the balance of the evidence, I am satisfied that the approach taken in the policy is appropriate and has regard to Section 8 of the NPPF. Whilst the Plan acknowledges that the policy is aspirational, it provides a clear signal of THPC's ambitions for Heathfield. Nevertheless, I recommend modifications to the wording used in each part of the policy to bring the clarity required by the NPPF. The recommended modification to the second part of the policy acknowledges that 'welcomed' has little weight in a land use planning policy.
- 7.21 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

In the first part of the policy delete 'strongly'

In the first part of the policy replace 'welcomed' with 'supported'

Policy THP 3 - Protecting and enhancing village character in Thriplow

- 7.22 The Plan advises that the purpose of the policy is to ensure that when development proposals are being proposed in Thriplow village additional key characteristics that are not already specifically mentioned in the Local Plan are recognised and provide a basis for informing new schemes.
- 7.23 This is a very good policy which captures the very distinctive character of this part of the neighbourhood area. However, to bring the clarity required by the NPPF and to address the specific points raised by SCDC, I recommend the following package of modifications:
- an explicit reference to Thriplow in the policy;
 - the incorporation of a proportionate element into the second part of the policy; and
 - the deletion of an element of the third part of the policy.
- 7.24 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace the first part of the policy with: 'Development proposals in Thriplow should achieve high quality design and a good standard of amenity for all existing and future occupants of land and buildings.'

Replace the opening element of the second part of the policy with: 'As appropriate to their scale, nature, and location, development proposals in Thriplow village should contribute positively to the existing

characteristics including the tapestry of rural spaces that exists between the Thriplow village-built environment. This includes:’

In the third part of the policy delete ‘through a transport assessment or, in the case of a smaller schemes, in an accompanying Design and Access/Planning Statement’

Policy THP 4 - Important Countryside Frontages in Thriplow village

7.25 The Plan advises that there are three areas in Thriplow village which have been identified in the Local Plan as Important Countryside Frontage (ICFs). The submitted Plan identifies two additional frontages for ICF designation (at Sheralds Croft Lane/Foremans Road and the Churchyard). The Plan advises that the intent of Policy THP 4 is to apply the Local Plan important countryside frontage designation to the frontages marked on Policy Map 12. I looked at the two proposed ICFs during the visit.

7.26 SCDC comments that:

‘the two frontages.... 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 ... 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.’

7.27 I sought advice from THPC on the extent to which it had assessed the two proposed Countryside Frontages against the relevant parts of policy NH/13 of the Local Plan. In its response to the clarification note, THPC commented that:

‘if the Examiner looks at the Landscape Character Assessment, which is replicated within Appendix 2 of the submission Neighbourhood Plan, there is a clear analysis against Policy NH/13 where 1(a) is the most relevant criterion to consider the points of uniqueness in Thriplow village and also in the landscape between Heathfield and Thriplow.’

7.28 I have considered this matter carefully. Policy NH/13 of the Local Plan comments that Important Countryside Frontages are defined where land with a strong countryside character either penetrates or sweeps into the built-up area providing a significant connection between the street scene and the surrounding rural area, or provides an important rural break between two nearby but detached parts of a development framework. Based on all the evidence I am not satisfied that the proposed ICFs meet these two tests. As

SCDC comment, they are within Green Belt where development is already strictly controlled through the application of national and local planning policies. In addition, the Church and the churchyard are also protected as heritage assets. In all the circumstances I recommend that the policy and the supporting text are deleted.

Delete the policy

Delete paragraphs 6.4/6.4.1/6.4.2

Delete the proposed ICFs on the relevant maps

Policy THP 5 - Locally valued views

- 7.29 Chapter 5 of the Plan highlights the importance of preserving and enhancing valued views of the open countryside found within the village of Thriplow, on the edges of the Thriplow village, on the edges of the settlement of Heathfield and from the popular network of public rights of way. A views assessment has been undertaken to identify the most valued views, alongside a description of their key features (Appendix 2). The intent of the policy is to recognise, preserve and enhance locally valued views.
- 7.30 The policy has a negative rather than a positive approach. I recommend that an additional element is incorporated into the policy to provide advice to developers about the way in which development proposals should be configured to secure planning permission.
- 7.31 SCDC questions the appropriateness of Views 11 and 12. I have carefully considered SCDC's comments and THPC's responses to the comments. On the balance of the evidence, I recommend that View 11 is deleted and that View 12 should remain. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

'The scale, height, layout, and design of development proposals should respond positively to the locally important views identified on Policy Maps 12, 13 and 14.

Development proposals will not be supported if they unacceptably impact on the locally important views.'

Delete View 11 from relevant maps

Policy THP 6 - Supporting the rural economy

- 7.32 The Plan advises that the intent of this policy is to recognise the importance of the rural economy in the parish whilst also requiring that development proposals are sympathetic to the parish's rural roots and landscape setting and do not adversely impact residential amenity of parishioners. The Plan advises that the final criterion of the policy has been included in response to the HRA.
- 7.33 The policy offers support for development proposals which support existing agricultural and other land-based rural businesses subject to a series of criteria. In general terms it has regard to Section 6 of the NPPF.
- 7.34 SCDC comments about the format of the policy and whether its remit should be broadened. I have considered these comments carefully. However, I am satisfied that the Intent of the policy (and the remainder of the supporting text) is clear that it offers support for development proposals which support existing agricultural and other land-based rural businesses rather than seeking to provide wider commentary on industrial development in the parish. SCDC suggests that any potential modifications should ensure that they have regard to a range of employment related policies in the Local Plan. However, in the context of the policy such modifications are not necessary as the relevant Local Plan policies will continue to apply.
- 7.35 Within this wider context, I recommend that the policy is recast so that it more clearly sets out its intentions. I also recommend that the criteria are modified so that they have a positive format (based on what development proposals should achieve) rather than a negative approach (what development proposals should avoid).
- 7.36 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace the policy with:

Development proposals which would support and/or sustain existing agricultural and other land-based rural businesses in the parish will be supported where they:

- **are of a scale appropriate to the rural location of the existing business;**
- **would safeguard the residential amenity of any residential properties in the immediate locality and can be accommodated within the local highway network;**
- **would safeguard the rural character and tranquillity of the parish;**

- would maintain and, where practicable, enhance the local character and prevailing openness of the landscape, as described in the Thriplow and Heathfield Landscape Character Assessment; and
- avoid an unacceptable impact on hedgerows or any severance of bat flight lines to protect foraging and commuting habitat for Barbastelle bats which could belong to the population protected by Eversden & Wimpole Woods SAC.

Policy THP 7 - Heathfield Local Green Spaces

- 7.37 The Plan advises that the intention of policy is to give the same land use protection to the open spaces in Heathfield as the open spaces in Thriplow. As such it proposes the designation of five local green spaces (LGSs).
- 7.38 I looked at the proposed LGSs carefully during the visit. I am satisfied that they meet the requirement set out for such designations as set out in paragraphs 105 and 106 of the NPPF.
- 7.39 I recommend that the policy element takes on matter of fact approach in paragraph 107 of the NPPF. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the second part of the policy with: ‘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

- 7.40 The Plan advises that the intent of the policy is threefold:
- to identify parish-specific sites and features, which must be taken account of when development proposals come forward;
 - to ensure the mitigation hierarchy is applied in the decision-making process; and
 - to highlight local opportunities to deliver biodiversity improvements in the parish and provide a guide as to how sites could potentially achieve biodiversity net gain. This policy will be applicable to proposals coming forward in all parts of the parish.
- 7.41 As submitted, the policy pulls in different directions. On the one hand it takes a comprehensive approach to these important matters and in general terms, has regard to Section 15 of the NPPF. However, on the other hand, it has a high element of overlap with relevant national policy and guidance.

- 7.42 SCDC makes a series of comments on the policy to which THPC has responded positively. The recommended modifications address the various matters, including the deletion of elements of the policy which repeat national policy. In the round they will bring the clarity required by the NPPF and allow SCDC to be able to apply the policy in a consistent way through the development management process.
- 7.43 I have considered the appropriateness of recommending that deleted elements of the policy are repositioned into the supporting text. However, in most cases (such as the mitigation hierarchy) the matter is already comprehensively addressed in the supporting text (in this case paragraph 6.8.11) and as such this approach is not required. In this context the integrity of the approach taken in the submitted policy is largely retained. However, I recommend the consequential deletion of elements of the supporting text which directly relate to deleted elements of the policy.
- 7.44 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

**Replace the opening element of the first part of the policy with:
‘Development proposals which are adjacent to, or which could otherwise have impacts on the integrity of a site or feature of biodiversity value should take full account of that value. This includes the following sites:’**

Delete the second, third and sixth parts of the policy.

Replace the fourth part of the policy with:

‘The delivery of biodiversity net gain (BNG) to meet national and local policy requirements should be achieved on development sites wherever possible. Any proposed off-site delivery of BNG should have regard to the latest guidance published by Greater Cambridge Shared Planning Interim Offsite Biodiversity Net Gain Protocol (July 2022) or any successor document.’

Delete paragraph 6.8.15

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

- 7.45 The Plan advises that the intent of the policy is to ensure the protection of the Hoffer Brook is considered a priority in the consideration of new development proposals in the parish and opportunities for funding.

- 7.46 The policy has three related parts. The first comments about general requirements for development proposals and the Hoffer Brook. The second comments for the need for sustainable drainage. The third advises about initiatives which are considered examples of work that may be required for the Hoffer Brook/tributaries of the Hoffer Brook and may be sought, where necessary to deliver sustainable development and where directly, fairly, and reasonably related in scale and kind to a proposed development; or as part of delivering biodiversity net gain under Policy THP 8.
- 7.47 I note that Hoffer Brook is an important feature of the neighbourhood area. In general, the policy takes a positive approach to the Hoffer Brook and has regard to Section 15 of the NPPF.
- 7.48 SCDC makes a series of comments on the policy to which THPC has responded positively. In addition, THPC responded positively to my proposition that the first and second parts of the policy should be applied proportionately. The recommended modifications address the various matters. In the round they will bring the clarity required by the NPPF and allow SCDC to be able to apply the policy in a consistent way through the development management process.
- 7.49 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the first and second parts of the policy with:

‘As appropriate to their scale, nature, and location, development proposals should demonstrate that neither the Hoffer Brook nor waterways feeding into the Brook will be unacceptably harmed because of any surface water run-off caused by the proposed development.

As appropriate to their scale, nature, and location, development proposals adjacent to the Hoffer Brook should incorporate sustainable drainage measures as a way of both managing surface water flood risk and protecting water quality in the parish, with reference to the Greater Cambridge Biodiversity SPD, Sustainable drainage systems (paragraph 5.5.16- 5.5.20).’

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

‘Where appropriate the following initiatives are the types of work that may be required for the Hoffer Brook/tributaries of the Hoffer Brook and which may be sought, where necessary to deliver sustainable development and where directly, fairly and reasonably related in scale

and kind to a proposed development; or as part of delivering biodiversity net gain under Policy THP 8.'

Policy THP 10 – Grainstore site allocation

- 7.50 The grainstore is the preferred site from the draft assessment exercise. It is addressed in the Environmental Report. I looked at the site carefully during the visit. I noted its relationship with the village (and the recreation ground) to the east and to the surrounding countryside to the north, south and west.
- 7.51 The Plan advises that the grain store site is on the western edge of Thriplow village on Fowlmere Road. It comprises a range of farm buildings, sheds, storage, silos and associated structures and hardstanding. This site is well related to Thriplow village with good access to existing village amenities. The vehicle repair shop, located outside the site to the south, is a successful and valued local business. The total area of the site is 1.23 hectares, including 0.4 hectares of land located in the Green Belt (on its western edge). The developable area of the site is 0.83 hectares.
- 7.52 The policy provides a comprehensive context for the proposed redevelopment of the grainstore site on the edge of Thriplow. Map 20 shows an indicative layout. It comments that approximately 20 homes will be supported which should incorporate a balanced mix of house sizes and tenure incorporating smaller units (1- and 2-bedroom units) suitable for older people seeking to downsize and younger adults seeking their first home as well as larger units (3-, 4- and 5-bedroom properties), suitable for families. It also advises that at least 40% of the homes to be provided as affordable housing and targeted to meet affordable housing needs in the parish. The policy also addresses the following matters:
- access;
 - connectivity and permeability;
 - landscaping;
 - design;
 - sustainable design and construction; and
 - biodiversity.
- 7.53 The supporting text advises that as part of a process to inform and understand community priorities in relation to this site, a landscape architect was commissioned to develop a landscape-led development brief for the site. In November 2021, consultation was undertaken with the community which included proposed principles to be followed in the planning of the site. The landscape led brief was revised following the consultation and following further liaison with the land promoter who advised that the site available for

development was to be reduced to allow for agricultural buildings to be built/remain to the south of proposed residential area.

7.54 The landscape-led approach has resulted in the following priorities for the site:

- the proposed retention current hedgerows and trees;
- proposals to plant native tree belt on the west side to provide screening and integrate the development with surrounding green belt land; and
- the maintenance of the vegetated character of Lodge Road by its lining with a hedge

7.55 SCDC comment 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 criterion, 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 criterion applied.’

It also makes some specific comments on elements of the policy.

7.56 The policy is very detailed. I am satisfied that it sets out comprehensive guidance for the development of this sensitive site. In the round it is a very good example of a neighbourhood plan policy for the allocation of a housing site. It has regard to Sections 5 and 12 of the NPPF and will significantly boost the supply of housing land in the parish. I am also satisfied that the policy has regard to Section 13 of the NPPF on land within the Green Belt. The proposed built element of the site is within the settlement boundary and the public open space and a tree belt are proposed on the western strip of the site (within the Green Belt). Based on the criteria in the policy, the scale and massing of the proposed development will also reduce the impact of built development on the Green Belt.

7.57 I am also satisfied that the policy follows the approach taken in the second part of Policy S/10 of the Local Plan.

7.58 The various detailed elements of the policy have been very well-considered. The sections on connectivity and permeability (part 3), landscaping (part 4), and design (part 5) are very impressive. In combination, they will ensure that the design of the site is appropriate to its location, and that the site will be well-connected with Thriplow and its commercial and community facilities.

7.59 Sections 6 and 7 of the policy have a focus on processes (the submission of a Statement/Study) rather than outcomes. In this context, I recommend that the focus is modified accordingly. I also recommend that the commentary about the need for a Statement/Study is relocated into the supporting text.

- 7.60 I recommend that part 7c of the policy is recast to take account of SCDC's comments, and as agreed by THPC in its response to the clarification note. Finally, I recommend that an error in paragraph 6.10.32 is remedied.
- 7.61 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace part 6 of the policy with:

'Wherever practicable, development proposals should facilitate low carbon living for future occupiers through:

- the reduction of the need for energy through site layout, orientation and building fabric;
- the incorporation of low carbon heating solutions; and
- the incorporation of renewable energy technology and other sustainability matters including measures to facilitate efficient use of potable water (appropriate fixtures, rainwater harvesting and utilizing opportunities for greywater recycling) set out in Appendix 1 to the Great Cambridge Sustainable Design and Construction SPD, or any updated version of that document.

Proposals which adopt an innovative approach to the construction of low and net zero carbon homes (for example construction to Passivhaus or similar standards) will be supported.'

Replace part 7a of the policy with:

'Development proposals should respond positively to the ecological significance of the site through:

- establishing that there would be no negative impact on flora and fauna;
- if any negative impacts are identified, establishing that these negative impacts are suitably mitigated against; and
- the overall scheme will deliver a net gain in biodiversity.'

Replace part 7c of the policy with:

'Enhance vegetation and hedgerows to maintain and encourage bat foraging opportunities for Barbastelle bats which could belong to the population protected by Eversden & Wimpole Woods SAC.'

At the end of paragraph 6.10.27 add: 'The seventh part of the policy addresses these matters. In most cases, the submission of a Sustainability Statement to accompany planning applications will be an effective way to demonstrate how the proposed development will facilitate low-carbon living.'

In paragraph 6.10.32 replace 'j' with '7c'

At the end of paragraph 6.10.35 add: 'The sixth part of the policy addresses these matters. In most cases, the submission of an Ecological Study to accompany planning applications will be an effective way to demonstrate how the proposed development will safeguard, and where practicable, enhance the habitat network.'

Policy THP 11 - Rural exception sites in Thriplow

- 7.62 The Plan advises that the intention of the policy is to encourage the delivery of rural exception sites that are outside the Thriplow development framework but well related to village services. The supporting text advises that rural exception sites are not considered appropriate on the edge of Heathfield due to its distance from Thriplow and lack of amenities
- 7.63 On the one hand, the policy overlaps with national and local planning policies on this matter. On the other hand, the five criteria in the policy are distinctive to the parish. As such I have concluded that it brings added parish-based value to existing policies. On this basis I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

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

- 7.64 The policy comments about the way in which car parking provision should be delivered in the parish. It also identifies opportunities which will be sought to help address existing problems when new development comes forward. It advises that any contributions being sought from new development will need to comply with national policy.
- 7.65 The policy is a combination of policy and supporting text. I recommend that the policy is modified so that it addresses only land use issues. Where it is not already addressed in the supporting text, I recommend that the non-policy elements are relocated into that part of the Plan.
- 7.66 I note the comments from SCDC about parking in rear courtyards. However, I am satisfied that evidence in Plan and local knowledge justifies the approach taken. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the first two parts of the policy with:

'Development proposals should adopt a design-led approach to addressing the parking needs generated by the development.'

Rear parking courtyards, will only be supported when the use of on-plot and on-street parking options are not practicable and evidence is submitted that the rear parking provision provides a convenient (easily accessed and exited), safe (with good surveillance) and attractive (incorporating landscaping) option for future occupiers.'

At the end of 6.12.13 add:

'The first part of Policy THP12 would normally mean providing dedicated parking on-plot and being guided by the indicative quantitative standards set out in the Local Plan (currently Policy TI/3) Parking Provision in the 2018 Local Plan. Off-plot parking provision will only be acceptable where spaces are provided in a convenient location, for example in the form of parking bays or inset bays, in front of or adjacent to the proposal and without impeding road safety, particularly for pedestrians and other non-motorised users. Tree planting and other landscaping should be incorporated to maintain or create a high-quality streetscape, that is not visually dominated by parked cars.'

The second part of policy THP 12 comments that a reliance on rear parking courtyards as providing suitable parking for residential properties will not normally be supported due to their proven under-utilisation in the parish and due to this resulting in damage to open space, amenity space and street scape through inappropriately parked vehicles. Rear parking courtyards, will only be considered as a viable option when all on-plot and on-street parking options are exhausted and evidence is submitted that the rear parking provision provides a convenient (easily accessed and exited), safe (with good surveillance) and attractive (incorporating landscaping) option for future occupiers.'

At the end of 6.12.14 add:

'Where appropriate and practicable, opportunities will be sought from new development proposals to:

- improve existing pavements serving the development to make them more accessible for all users;*
- alleviate existing congestion and on street parking issues particularly relating to the Thriplow primary school and in the parking issues in Heathfield; and*
- where necessary to achieve a good quality and accessible walking and cycling environment to meet the needs of the users of the development and where directly, fairly, and reasonably related in scale and kind to the development, s106 contributions towards the initiatives identified above will be sought.'*

Policy THP13 - Protecting and improving the rural footpath network and sustainable connections to neighbouring settlements

- 7.67 The Plan advises that the intention of the policy is to protect and improve routes for non-motorised users in the parish so that parishioners have increased options for both outdoor recreation purposes and for travelling to neighbouring settlements and linking up with the local railway network. The policy has three related elements.
- 7.68 I have considered the representations from SCDC and the British Horse Society.
- 7.69 As submitted, the wording used in the policy does not have the clarity required by the NPPF. In addition, the second part does not fully reflect the way in which SCDC will seek to secure developer contributions from development proposals. I recommend that these issues are remedied by a recasting of the policy.
- 7.70 The incorporation of the comments from the British Horse Society into the Plan are not necessary to ensure that the policy meets the basic conditions.
- 7.71 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘Development proposals should protect existing rural routes available to for non-motorised users in the parish (as shown on Maps 21, 22 and 25).

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 (as shown on Maps 21, 22) will be sought.

Wherever practicable, development proposal should take opportunities to improve the existing footpath, bridleway and cycling routes (as shown on Maps 23 and 24).’

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

- 7.72 The Plan advises that the policy is aspirational in its nature. It welcomes future proposals that will lead to better links between the Heathfield and Thriplow communities. The second part of the policy has been added as a requirement from the HRA. The supporting text highlights that proposals must also comply with Policy THP 8.

- 7.73 In general terms, the policy takes a positive approach to this matter and has regard to Section 8 of the NPPF. Nevertheless, I recommend modifications to the wording used in the first and second parts of the policy so that they properly express their intentions and have the clarity required by the NPPF.
- 7.74 I also recommend that the order of the second and third parts of the policy are reversed. As submitted, the element of the policy which arises from the HRA separates the policy in an unnatural and artificial way. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the first part of the policy with:

‘Development proposals which would facilitate opportunities for the Heathfield and Thriplow communities to come together will be supported. This support would extend to improved sustainable travel routes and the provision of a community meeting space or outdoor recreation area which would serve both communities.’

Replace the third part of the policy with:

‘Development proposals which would lead to additional severance between the two communities, including those which would adversely impact the existing sustainable travel routes between the two communities, will not be supported.’

Replace the order of the second and third elements of the policy.

Policy THP 15 - Thriplow and Heathfield infrastructure priorities

- 7.75 The context to the policy is that SCDC does not apply a community infrastructure levy (CIL). In this context, THPC has set out the priorities which it would apply locally to the use of any future CIL funding generated in the neighbourhood area.
- 7.76 In general terms the approach taken towards the use of potential future CIL funding is appropriate. However, I sought THPC’s views on whether the issue is a land use policy. In its response to the clarification note it advised that:
- ‘flagging up existing and projected shortcomings in infrastructure provision is an important part of neighbourhood planning. In this case, the policy was prepared in response to comment made at the (pre-submission stage) by SCDC in particular that the language in the NP regarding infrastructure should remain broad enough so that they could be applied to different policy realities.’*
- 7.77 I have considered this matter very carefully and have reflected on SCDC’s commentary. On the balance of the evidence, I recommend that the policy is

deleted and that the approach taken is relocated into the section on other community initiatives. I have reached this conclusion for the following reasons:

- there is no indication of when CIL will be introduced in the District;
- as such, the approach taken is rather academic; and
- the matter can be addressed in a review of the Plan if SCDC introduces a CIL.

Delete the policy

Delete paragraph 6.14.5

Other Community Initiatives

7.78 The Plan includes a series of community initiatives. They have naturally arisen as the Plan was prepared. They are set out in a separate part of the Plan (Section 7) to distinguish them from the land use policies. This is best practice.

7.79 I am satisfied that the Initiatives are both appropriate and distinctive to the parish. The following Initiatives are noteworthy:

- Community Initiative 2 Heathfield Community Centre;
- Community Initiative 3 Heathfield design and management of open spaces;
- Community Initiative 5 Improved outdoor recreation facilities; and
- Community Initiative 8 Reducing parish speed limits.

7.80 I have recommended that Policy THP15 is repositioned as an additional Community Initiative. It should be achieved as follows:

At the end of Section 7 add:

‘Infrastructure Priorities

Community Initiative 11: securing infrastructure priorities in Thriplow and Heathfield

Financial contributions or direct provision of new infrastructure will be sought to secure infrastructure improvements made necessary by development proposals. This could include:

- *improvements set out in the Heathfield Enhancement Strategy;*
- *delivering improved outdoor recreation facilities;*
- *biodiversity improvements and enhancements to ecological networks;*

- *improving existing pavements serving development to increase their accessibility for all users;*
- *measures that would help to alleviate existing congestion and on-street parking issues particularly relating to Thriplow primary school and Heathfield;*
- *improving the network of rural routes for non-motorised users; and*
- *other items of community infrastructure identified as being necessary during the Plan period.'*

Other Matters – General

- 7.81 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for SCDC and THPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

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

Other Matters – Specific

- 7.82 SCDC has made a series of helpful comments on both the policies and the supporting text in the Plan. I have included them in the recommended modifications on a policy-by-policy basis where they are required to ensure that the Plan meets the basic conditions.
- 7.83 I also recommend modifications to the text of the Plan to ensure that the Plan meets the basic conditions. They are based on SCDC's comments on the general elements of the Plan. The schedule simply refers to the SCDC numbering system. The recommended modification is the action contained in that element of the representation.

SCDC comments 6,7,8,58-62, 64 and 68.

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2041. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area.
- 8.2 Following the independent examination of the Plan, I have concluded that the Thriplow and Heathfield Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

Conclusion

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

Other Matters

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the District Council on 25 August 2017.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The responses to the clarification note were detailed, informative and delivered in a very timely fashion.

Andrew Ashcroft
Independent Examiner
17 February 2025