# Foxton Neighbourhood Plan

# **Response Form**



This form has two parts to complete (please use black ink):

## PART A – Your Details PART B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or <a href="mailto:neighbourhood.planning@scambs.gov.uk">neighbourhood.planning@scambs.gov.uk</a>

## All comments must be received by 5pm on Tuesday 28 April 2020.

## **Data Protection**

We will treat your data in accordance with our Privacy Notices: <u>www.scambs.gov.uk/planning-policy-privacy-notice/</u>. Information will be used by South Cambridgeshire District Council solely in relation to the Foxton Neighbourhood Plan. Please note that all responses will be available for public inspection and cannot be treated as confidential. Representations, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.** 

The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'. Do you wish to be kept informed of future stages of the Foxton Neighbourhood Plan? Please tick: Yes  $\boxtimes$  No  $\square$ 

# PART A – Your Details

Please note that we cannot register your comments without your details.

Name:	Sara Anderson	Agent's name:
Name of organisation: (if applicable)	Cambridgeshire County Council	Name of Agent's organisation: (if applicable)
Address:	Shire Hall, Castel Street, Cambridge	Agent's Address:
Postcode:	CB3 0AP	Postcode:
Email:		Email:
Tel:		Tel:
Signature:	Date:	
If you are submitting the form electronically, no signature is required.		

**PART B – Your Response** 

For office use only Agent number: Representor number: Representation number:

What part of the Neighbourhood Plan do you have comments on?	
Policy or Paragraph Number (please state)	
Do you Support, Object or have Comments? (Please tick)	🖂 ОВЈЕСТ

## **Reason for SUPPORT, OBJECT or COMMENT:**

Please give details to explain why you support, object or have comments on the Neighbourhood Plan. If you are commenting on more than one policy or paragraph, please make clear which parts of your response relate to each policy or paragraph

## If you consider that the referendum boundary should be extended please outline your reasons.

Under Policy FOX/7, Cambridgeshire County Council, as landowner, objects to the inclusion of Foxton woods, as shown in Figure 16, as important green space. Cambridgeshire County Council is already working with the village to enhance the community's enjoyment of Foxton wood through permissive paths. The management of the Foxton Woods, both for recreation purposes and growing of timber, might be restricted if designated as an 'important green space'.

**Summary of Comments:** If your comments are longer than 100 words, please summarise the main issues raised.

## COMPLETED FORMS MUST BE RECEIVED BY 5PM ON 28 APRIL 2020 AT:

Email: <u>neighbourhood.planning@scambs.gov.uk</u> or post it to:

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

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Under Policy FOX/6, Cambridgeshire County Council, as landowner, objects to the strategic views designated across its land holdings as shown on Figure 15: Key views, village gateways and sensitive edges (and the policies maps Figures 30B). Cambridgeshire County Council is currently promoting this land under the Greater Cambridge Local Plan 'Call for Sites' and will continue to promote the land at any subsequently stages, as appropriate. These strategic views are also shown in Figure 11: Foxton Conservation Area with listed buildings and other non-designated heritage assets. (Appendix 1 lists these buildings by category) Source: Conservation Area Appraisal.

**Summary of Comments:** If your comments are longer than 100 words, please summarise the main issues raised.

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Policy or Paragraph Number (please state)		
Do you Support, Object or have Comments? (Please tick)	🖂 ОВЈЕСТ	
Reason for SUPPORT, OBJECT or COMMENT:         Please give details to explain why you support, object or you are commenting on more than one policy or paragraph         If you consider that the referendum boundary should be         Under Policy FOX/5, Cambridgeshire County Council, a sensitive urban edge across its land holdings as shown and opportunities (as shown in the 2017 LCA).         Summary of Comments:         If your comments are longer than 100 words, please su	e extended please outline your reasons. as landowner, objects to the inclusion of the on Figure 14: Landscape constraints, sensitivities	

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Email: <u>neighbourhood.planning@scambs.gov.uk</u> or post it to:

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

Respondent: Cambridgeshire County Council Date received: 28/04/2020 via Email

#### Summary:

Under Policy FOX/6, Cambridgeshire County Council, as landowner, objects to the strategic views designated across its land holdings as shown on Figure 15: Key views, village gateways and sensitive edges (and the policies maps Figures 30B). Cambridgeshire County Council is currently promoting this land under the Greater Cambridge Local Plan 'Call for Sites' and will continue to promote the land at any subsequently stages, as appropriate. These strategic views are also shown in Figure 11: Foxton Conservation Area with listed buildings and other non-designated heritage assets. (Appendix 1 lists these buildings by category) Source: Conservation Area Appraisal.

Full text:

Change suggested by respondent:

Respondent: Cambridgeshire County Council Date received: 28/04/2020 via Email

#### Summary:

Under Policy FOX/7, Cambridgeshire County Council, as landowner, objects to the inclusion of Foxton woods, as shown in Figure 16, as important green space. Cambridgeshire County Council is already working with the village to enhance the community's enjoyment of Foxton wood through permissive paths. The management of the Foxton Woods, both for recreation purposes and growing of timber, might be restricted if designated as an 'important green space'. Full text:

## -

Change suggested by respondent:

Respondent: Cambridgeshire County Council Date received: 28/04/2020 via Email

#### Summary:

Under Paragraph 5.48, Cambridgeshire County Council, as landowner, strongly objects to the proposal for the creation of a larger biodiversity enhancement area on sloping agricultural fields between the woodland and village edge (Figure 14). Cambridgeshire County Council is currently promoting this land under the Greater Cambridge Local Plan 'Call for Sites' and will continue to promote the land at any subsequently stages, as appropriate. It should be noted that even if the land is not allocated in the Greater Cambridge Local Plan, Cambridgeshire County Council's tenants will want to farm the land in line within future regulations but in the most commercial way.

Full text:

Change suggested by respondent:

Respondent: Cambridgeshire County Council Date received: 28/04/2020 via Email

#### Summary:

Under Paragraph 7.17, Cambridgeshire County Council, as landowner, strongly objects to the identification of an enhanced chalk grassland area between Foxton Woods and the village. Cambridgeshire County Council is currently promoting this land under the Greater Cambridge Local Plan 'Call for Sites' and will continue to promote the land at any subsequently stages, as appropriate. It should be noted that even if the land is not allocated in the Greater Cambridge Local Plan, Cambridgeshire County Council's tenants will want to farm the land in line within future regulations but in the most commercial way.

Full text:

Change suggested by respondent:

-

Respondent: Cambridgeshire County Council Date received: 28/04/2020 via Email

#### Summary:

Page 43, under the description of Foxton Village, Cambridgeshire County Council, as landowner, would comment that this statement should read '....the open green spaces of varying scales and naturalness within the village are all important landscape features, and opportunities should be taken to enhance and expand them, if landowners are agreeable' and not simply 'the open green spaces of varying scales and naturalness within the village are all important landscape features, and opportunities should be taken to enhance and expand them'. Without the agreement of landowners, these aspirations will not be deliverable.

#### Full text: -

Change suggested by respondent:

#### Respondent: Sport England Date received: 12/01/2021 via Email

#### Summary:

General comments about the importance of sport.

#### Full text:

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

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

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing\_fields\_policy

Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

http://www.sportengland.org/planningtoolsandguidance

If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/

Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities

PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing

Sport England's Active Design Guidance: https://www.sportengland.org/activedesign

Change suggested by respondent:

-

#### Respondent: Forestry Commission England Date received: 12/01/2021 via Email

## Summary

General comments about the value of trees and neighbourhood plans

#### Full text:

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

Forestry Commission and Neighbourhood Planning

Existing trees in your community

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

Ancient Woodland

If you have ancient woodland within or adjacent to your boundary it is important that it is considered within your plan. Ancient woodlands are irreplaceable, they have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "there are wholly exceptional reasons and a suitable compensation strategy exists" (National Planning Policy Framework paragraph 175).

The Forestry Commission has prepared joint standing advice with Natural England on ancient woodland and veteran trees. This advice is a material consideration for planning decisions across England and can also be a useful starting point for policy considerations.

The Standing Advice explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees. It will provides links to Natural England's Ancient Woodland Inventory and assessment guides as well as other tools to assist you in assessing potential impacts.

#### Deforestation

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

#### Woodland Creation

The UK is committed in law to net zero emissions by 2050. Tree planting is recognised as contributing to efforts to tackle the biodiversity and climate emergencies we are currently facing. Neighbourhood plans are a useful mechanism for promoting tree planting close to people so that the cultural and health benefits of trees can be enjoyed alongside their broader environmental benefits. Any planting considered by the plan should require healthy resilient tree stock to minimise the risk of pests and diseases and maximise its climate change resilience, a robust management plan should also be put in place.

#### Change suggested by respondent:

-

## 68598

Comment

#### Respondent: Greater Cambridge Partnership Agent: Strutt and Parker LLP

Date received: 08/02/2021 via Email

#### Summary:

Policy FOX/19

Since original representation submitted in April 2020 a decision has been made by GCP to opt for the southern option for the site of the Foxton Travel Hub. This Plan needs to be updated to reflect this.

#### Full text:

I write on behalf of the Greater Cambridge Partnership (GCP) in connection with the above consultation, which has been restarted following it being paused last year due to COVID.

Prior to the pausing of the consultation, the GCP submitted representations to the draft neighbourhood plan – see attached for reference.

Since submitting the original representations, the GCP has been working up the proposed Travel Hub in the background and considered it necessary to submit a short update – see attached - which we trust will be taking into consideration alongside the original representations.

# Change suggested by respondent:

Attachments: Response Form - https://scambs.oc2.uk/a/sd94p Emailed Letter - https://scambs.oc2.uk/a/sd94q Emailed Letter - https://scambs.oc2.uk/a/sd95r

### 68599

Comment

#### Respondent: Greater Cambridge Partnership Agent: Strutt and Parker LLP

Date received: 08/02/2021 via Email

### Summary:

Policy FOX/18

As an update to the representations submitted in April 2020 GCP are now proposing in addition to the Foxton Transport Hub a pedestrian footbridge over the railway line. This is consistent with this draft policy.

A planning application for the Hub including the footbridge expected to be submitted in July 2021

#### Full text:

I write on behalf of the Greater Cambridge Partnership (GCP) in connection with the above consultation, which has been restarted following it being paused last year due to COVID.

Prior to the pausing of the consultation, the GCP submitted representations to the draft neighbourhood plan – see attached for reference.

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# PART A – Your Details

Please note that we cannot register your comments without your details.

Name:	Mr	Agent's name:	Sav Patel
Name of organisation: (if applicable)	Greater Cambridge Partnership	Name of Agent's organisation: (if applicable)	Strutt & Parker
Address:		Agent's Address:	66-68 Hills Road, Cambridge,
Postcode:		Postcode:	CB2 1LA
Email:		Email:	
Tel:		Tel:	
Signature:		Date:	14/04/2020
lf you are subm	nitting the form electronically, no sigr	nature is required.	

**PART B – Your Response** 

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Do you Support, Object or have Comments? (Please tick)	<ul> <li>SUPPORT</li> <li>□ OBJECT</li> <li>⊠ COMMENT</li> </ul>	
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Summary of Comments: If your comments are longer than 100 words, please summarise the main issues raised.		
See attached cover letter		

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Email: neighbourhood.planning@scambs.gov.uk or post it to:

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



Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council Cambourne Business Park Cambourne Cambridge CB23 6EA Greater Cambridge Partnership SH1317 Shire Hall Cambridge CB3 0AP

Sent via email to: <a href="mailto:neighbourhood.planning@greatercambridgeplanning.org">neighbourhood.planning@greatercambridgeplanning.org</a>

Dear Sir/Madam,

## **RE: Foxton Neighbourhood Plan (Regulation 16 consultation)**

I write further to our original representations letter dated 14 April 2020.

Whilst we understand this is a 'restart' of the paused consultation from last year, and remain supportive of the Foxton Neighbourhood Plan (FTP), we would like to provide an update on the proposed Foxton Travel Hub (FTH) since making our previous comments.

Draft Policy FOX/19 of the FNP relates to the FTH and the map on page 85 indicated two possible locations for the travel hub.

As mentioned in our original representations, two possible site options were being considered ('northern option' and 'southern option') and that a decision on which option to progress to the planning application stage would be made on 25 June 2020. Since our previous representations, the decision has been made to progress the 'southern option'. Therefore, the GCP believes it is important, for the purposes of consistent and completeness, to reflect this update in the FNP. This would also avoid any confusion from local residents, stakeholders and readers of the FTH.

In addition to this, the proposed FTH will now also include a pedestrian footbridge over the railway line to improve access to each platform when the barriers are down. The GCP is working closely with Network Rail to assess whether a ramped footbridge or stepped footbridge with a lift would be required to ensure there is inclusive access. At this stage, no decision has been made on this but both options are being worked up for consideration. In additional to consulting with Network Rail, the GCP will be carrying out consultation events to inform local residents, relevant local groups (including the Parish Council) and key stakeholders about the footbridge options.











Alongside the footbridge, the GCP is also looking making other improvements to improve accessibility and connectivity to railway station such as reducing traffic speed along a section

of the A10, providing a refuse island for people crossing the A10, and provide disabled car parking spaces closer to the railway station to provide safe and convenient access to the station.

These improvements and particularly the addition of a new footbridge crossing would be consistent with draft Policy FOX/18 (New Development and Connectivity) which seeks to ensure the users of the new development (travel hub) can conveniently and safely access, amongst other things, Foxton railway station.

A planning application for the FTH including footbridge is currently being worked up in the background in terms of carrying out relevant surveys and assembling the detailed designs. An application is expected to be submitted in July 2021 but before then the GCP will be carrying out public consultation events on the latest proposals.

Overall, the GCP welcomes and is supportive of the Foxton NP, and is committed to working with the Parish Council to progress the Travel Hub project in a way that benefits the local community and local environment.

Yours faithfully,



Sav Patel Associate Director Strutt & Parker

On behalf of the Greater Cambridge Partnership











Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council Cambourne Business Park Cambourne Cambridge CB23 6EA Greater Cambridge Partnership SH1317 Shire Hall Cambridge CB3 0AP

Sent via email: <u>neighbourhood.planning@greatercambridgeplanning.org</u>

## **RE: Foxton Neighbourhood Plan (Regulation 16 consultation)**

Thank you for the opportunity to review and formally comment on the submission version of the Foxton Neighbourhood Plan.

The Greater Cambridge Partnership (GCP) welcomes Foxton Parish Council's Neighbourhood Plan (NP), which is a comprehensive and well thought through document. However, this consultation response will focus on Sections 9 (Transport) and 10 (Foxton Travel Hub) of the NP.

For background, the GCP is in the process of working up proposals for a new Travel Hub (Park & Rail Scheme) on the outskirts of Foxton village. The Travel Hub will be located in one of two potential locations close to the railway station. A GCP board decision on the preferred location for the Travel Hub is expected to the made on 25 June 2020. Whichever option is chosen, the GCP will ensure there are suitable pedestrian and cycle access improvements to the railway station for commuters and local residents. The specific proposals to facilitate highway safety measures will be discussed and agreed with the Highway Authority.

The main objectives of the Travel Hub are to intercept and reduce traffic along the A10 corridor heading into Cambridge, encourage the use of sustainable modes of transport such as rail services available at Foxton station, and improve connectivity and accessibility locally, but also throughout Greater Cambridge.

These objectives would align with Objectives 10i and 10ii of the NP which seek to reduce the impact of traffic in the parish, improve safety for all and provides improved facilities to access high quality public transport services.

The scheme also intends to reduce the number of commuters parking in the village to use Foxton station.

Whilst detailed plans for the Travel Hub and associated infrastructure improvements are yet to be finalised, the proposals would in principle align with Policy FOX/17 (Alleviating











Growing and sharing prosperity

Congestion and Improving Traffic Flows). Policy FOX/17 states development proposals will be supported where they would alleviate existing congestion, improve pedestrian safety, provide parking for village facilities and other similar improvement proposals and improve traffic flows through the village. The GCP therefore supports the aspirations of this policy.

The GCP is also, as part of the Melbourn Greenway, looking at implementing a reduced speed limit on the A10 close to the level crossing, which would make it easier and more attractive to cross. The proposed Travel Hub access might also provide a gateway feature, and visual cue regarding the change in character to the road, to further support a reduced speed limit here. The proposed improvements from the Greenway would be incorporated into the preferred Travel Hub option to ensure a coordinated strategy is provided. Therefore, the GCP supports the intention of Policy FOX/18 which aims to ensure any future development provides adequate pedestrian and cycle connections. The policy states proposals which seek to increase access points onto existing roads, or increase traffic generation, will need to demonstrate that they will not have a harmful effect on congestion and road safety, nor exacerbate on-street parking constraints within the village.

The GCP is of the view that whilst the Travel Hub proposals would create a new entrance onto existing roads, it would seek to reduce traffic travelling along the A10 into Cambridge and provide a dedicated car park to alleviate on-street parking in the village. Whilst the new junction will introduce a new conflict point, the GCP is liaising with the County Highway Safety team and appropriate mitigation measures will be made in accordance with their guidance. The Travel Hub proposals would also improve pedestrian and cycle connectivity across the A10 to access the railway station, which would facilitate pedestrian access into the village from the west. The GCP is therefore supportive of this policy.

Section 10 of the NP focuses on the Foxton Travel Hub which the GCP has worked closely with the Parish Council and local residents on in terms of engaging with them on proposals for the Travel Hub options and understanding their main concerns. The GCP will continue to work and engage with the Parish Council, local residents and other key stakeholders on the Travel Hub project.

However, the last sentence in paragraph 10.11 of the NP is considered to be a misleading statement. The Cambridge South station proposal is not a GCP project. It is a project that Network Rail will be bringing forward subject to receiving the appropriate funding and consents. Therefore, for clarity, the GCP requests that this paragraph be amended to make it clear that Cambridge South station is not a GCP project.











Growing and sharing prosperity

Whichever Travel Hub option is chosen as the preferred site, the GCP will facilitate improvements to pedestrian and cycling access and connectivity to the railway station and village to the benefit of the local community. Various options proposals for such improvements are being considered and will be worked up in consultation with the local community and relevant user groups.

One of the main objectives of the Travel Hub proposal is to reduce congestion along the A10 corridor by providing an alternative travel option into Cambridge that links to other public transport services.

In terms of impact on residential amenity and the local environment, these will be appropriately considered in the site selection process. The GCP is already looking at ways to mitigate the potential impacts of the Travel Hubs on local residents and local environment as these are important factors for consideration. The GCP will also work with other project providers such as Network Rail, Local Planning Authorities, the Mayor of the Cambridgeshire and Peterborough Combined Authority and landowners to ensure the pipeline of programmed projects (Cambridge South station, Foxton Level Crossing bypass, East-West Rail etc..) do not undermine the character of the village.

The GCP is therefore supportive of the intention of the policy but feels the wording of policy FOX/19 (Foxton Travel Hub) should be revised to be more prescriptive of the types of benefits and location. This would help to manage expectations and avoid confusion as the Travel Hub site would not be able to bring forward improvements outside the site area.

Overall, the GCP welcomes and is supportive of the Foxton NP, and is committed to working with the Parish Council to progress the Travel Hub project in a way that benefits the local community and local environment.

Yours faithfully,



Sav Patel Associate Director Strutt & Parker

On behalf of the Greater Cambridge Partnership









## 68600

#### Respondent: Mr Jamie Trinidad

# Comment

#### Date received: 08/02/2021 via Email

#### Summary:

Policy FOX/6 Protect and Enhance Key Views and Village Gateways

Requesting that the sensitive urban edge be extended to include boundaries behind Church View and barn to west of footpath. Consultation Statement records that the parish council had agreed to extend but no revision has been made on Figures 15 and 30B.

The boundary in question, abutting open fields, should be classified as part of the village's sensitive edge, as should the boundary that runs behind the houses along Station Road. As far as possible, the edge of the village abutting open fields should be protected.

Full text:

Thank you for the work undertaken by the PC in the preparation of the revised Neighbourhood Plan. I am grateful to the PC for taking on board the comments of residents.

The Consultation Statement refers at appendix 9 (p.56) to a discussion concerning the sensitive urban edge and the possibility of extending it 'to include boundaries behind Church View and barn to west of footpath'.

The document records the PC having '[d]iscussed and agreed to extend', and refers to figs 15 and 30B of the revised plan.

However, figs 15 and 30B show that the boundary behind the grade 2 listed barn to the west of the footpath is not classified as sensitive edge. This may be an oversight, but either way I would urge the PC to revisit this issue.

It seems to me that the boundary in question, abutting open fields, should be classified as part of the village's sensitive edge, as should the boundary that runs behind the houses along Station Road. As far as possible, the edge of the village abutting open fields should be protected

If however the PC has considered this issue and decided that there is a rational basis for not continuing the sensitive edge along the boundary west of Church View, I would be grateful if the PC's reasoning could be explained in the revised plan.

Many thanks for considering this submission, and for your continuing efforts on behalf of our community.

Change suggested by respondent:

Attachments: None

## 68601

Comment

Respondent: South Cambridgeshire District Council Date received: 16/02/2021 via Email Summary:

Mapping issues

SCDC had previously suggested need to consider larger scale maps to cover whole of parish to provide a comprehensive Policies Map – maybe at A3 scale so easy to read. Figures 30A and 30B remain at a small scale that make it difficult to define the precise boundaries of designations.

Alternatively, suggested consideration of approach used in Local Plan Policies Map where individual villages can be covered by several A4 maps at legible and easy to read scales.

Figures 11i-11v could benefit from each being A4 size with crisp boundaries. Keys all have become somewhat blurry. Also Ordinance Survey mapping copyright is indistinct on all maps.

Full text:

-

## Change suggested by respondent:

## 68602

Respondent: South Cambridgeshire District Council Date received: 16/02/2021 via Email

Summary:

Policy FOX2

Supportive of policy but concerns on implementation and clarity. Not clear how information required should be provided by applicant.

Does it comply with WMS 25/3/15?

Need to define zero carbon emissions. What evidence would need to be submitted for compliance with policy?

Bullet 3 - Replace fabric efficiency with energy efficiency

Bullet 4 - BREEAM excellent hard to achieve with small developments - use only for large?

Bullet 6 - Add anything locally specific to Local Plan Policy NH/15? Bullet 7 - Suggest amend wording for clarity

Evidence to support policy? Will impact future viability of developments.

Full text:

Change suggested by respondent:

-

## 68603

Comment

Respondent: South Cambridgeshire District Council Date received: 16/02/2021 via Email Summary:

#### Policy FOX/4

First paragraph repeat of Local Plan Policy NH/14

Non-designated assets shown on Policies Map as letters - not showing boundaries of asset - suggest changing for clarity. Could include description of each non-designated asset in Plan? Figure 13 - What are the features shown on map as red asterisks?

Need to define what is meant by 'harm ' in policy.

Full text: -

#### Change suggested by respondent:

-

## 68604

**Respondent:** South Cambridgeshire District Council **Date received:** 16/02/2021 via Email

#### Summary: Policy FOX/5

The policy implies that it will be all scales of development that would need to be considered under this policy - is this the intention?

In the first bullet point mention is made of the terms 'hard edge' and 'blend'- these terms should be defined.

Does the second bullet point about Green Belt sensitive edges add any locally specific detail? There is a Local Plan policy that considers such land - Policy NH/8. (BC test)

Final section about development in the open countryside – what development would be expected here? There are Local Plan policies that cover this issue. E.g. Policy S/7 and Policy NH/3. (BC test)

Full text:

#### Change suggested by respondent:

-

## 68605

Comment

Respondent: South Cambridgeshire District Council Date received: 16/02/2021 via Email

#### Summary: Policy FOX/7

Many different terms used in Plan for green open space. Plan would benefit from tighter descriptions of open space to be protected.

Factual inaccuracy in paragraph 5.38 Policy does not need to repeat protection given in Local Plan Policies NH/11 and NH/12.

Define 'built up area of the village'. Are all new sites designated shown on the Map? Conservation Appraisal - not Assessment.

Full text: -

#### Change suggested by respondent:

-

## 68606

Respondent: South Cambridgeshire District Council Date received: 16/02/2021 via Email

#### Summary: Policy FOX/8

This is somewhat repeating the biodiversity policies in the Local Plan

Supporting paragraph 5.5 states that there are no biodiversity designated sites within the Parish boundary; however, the River Rhee/Cam which forms the northern boundary of the Parish is designated as a County Wildlife Site. This should be included within the paragraph. In the policy references to 'net gain in biodiversity' should be changed to 'measurable net gain in biodiversity' as per paragraph 174 (b) and 175 (d) of the

National Planning Policy Framework 2018. The difference between 'net gain' and 'measurable net gain' is considerable.

Full text: -

### Change suggested by respondent:

## 68607

Comment

Respondent: South Cambridgeshire District Council Date received: 16/02/2021 via Email

Summary: Policy FOX/9

Does this comply with WMS 25/3/15? Neighbourhood plans can not set out any additional local technical standards or requirements. Viability of policy? Does it apply to all buildings?

Full text:

# Change suggested by respondent:

Respondent: South Cambridgeshire District Council Date received: 16/02/2021 via Email

#### Summary:

Policy FOX/10

Mention is made in the final paragraph of this policy to Standard M4(2). See comments for Policy FOX/9 regarding the Written Ministerial Statement 25 March 2015. If this is not the case, should the term 'where appropriate' be added to allow for flexibility where there may be a need for exceptions to the policy? Full text:

-

#### Change suggested by respondent:

## 68609

Comment

Respondent: South Cambridgeshire District Council Date received: 16/02/2021 via Email

#### Summary: Policy FOX/11

This is repeating Local Plan Policy H/11 about exception sites although there are some locally specific elements. We continue to have concerns that the policy by discouraging all development in the chalklands area is too restrictive. In the future it may be that to meet the local housing needs of the parish that sites in the chalkland area may have to be considered.

# Full text:

Change suggested by respondent:

#### -

## 68610

Respondent: South Cambridgeshire District Council Date received: 16/02/2021 via Email

#### Summary: Policy FOX/12

In the first sentence of the policy the term 'significant harm' is used. This term should be defined for clarity.

The policy asks for evidence, but it is unclear what actual evidence would be required to support this policy. Policy SC/3 in the Local Plan protects community facilities. The neighbourhood plan policy does include facilities specific to Foxton but repeats only part of the local plan policy criteria – It could be interpreted as a weaker policy. It would be preferable to highlight the specific facilities in Foxton and cross refer to be the policy and the policy and the policy action in the policy and the policy Policy SC/3.

Full text:

-

#### Change suggested by respondent:

**Respondent:** South Cambridgeshire District Council **Date received:** 16/02/2021 via Email

#### Summary: Policy FOX/14

This policy is all embracing. Policy SC/7 in the Local Plan protects recreation grounds, allotments and community orchards. It is unclear what is meant by existing open spaces – is there a map to show all such areas within the village? Would future green spaces be considered? Is there an overlap with the green spaces protected in Policy FOX/7?

# Full text:

Change suggested by respondent:

#### -

Respondent: South Cambridgeshire District Council Date received: 16/02/2021 via Email

Summary:

Policy FOX/16 Local Plan policies cover many of the criteria included in this policy. The only exception is the final criteria about electric charging points

Full text:

Change suggested by respondent:

Respondent: South Cambridgeshire District Council Date received: 16/02/2021 via Email

Summary:

Policy FOX/18

The last section of policy talks about proposals that generate a significant amount of traffic in the area. It is not clear how this significance would be measured.

Full text:

Change suggested by respondent:

**Respondent:** South Cambridgeshire District Council **Date received:** 16/02/2021 via Email

#### Summary: Policy FOX/20

Policy refers to a "site" but the map identifies two sites. Would both sites be allowed to be developed or only one? Policy includes the phrase 'minimising negative impact on... the local environment'. It should explicitly recognise heritage assets/the historic environment.

Full text:

#### Change suggested by respondent:

Respondent: South Cambridgeshire District Council Date received: 16/02/2021 via Email

#### Summary:

Designated heritage assets should be taken from the National Heritage List for England.

The list of heritage assets can become out-of-date and therefore, if it's considered necessary to include the list, the date and source of the list should be also be stated.

# Full text:

Change suggested by respondent:

## SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL RECORD OF CHIEF OFFICER/HEAD OF SERVICE DECISION

This form should be used to record key and other decisions made by Chief Officers and Heads of Service. The contact officer will ensure that the signed and completed form is given to Democratic Services as soon as reasonably practicable after the decision has been taken.

A key decision shall not be taken unless notice of the item has been published at least 28 days before the decision is to be taken except where:

- a General Exception notice has been published under Rule 15 of the Access to Information Procedure Rules and the Chairman of Scrutiny and Overview Committee has been informed in writing; or
- where a Special Urgency notice has been published under Rule 16 of those Rules and the Chairman of Scrutiny and Overview Committee has agreed the decision is urgent.

Unless permission has been obtained from the Chairman of Council and the Chairman of the Scrutiny and Overview Committee that a key decision may be treated as a matter of urgency under Rule-12.19 of the Scrutiny and Overview Committee Procedure Rules, any key decision will come into force, and may then be implemented, on the expiry of five working days after the publication of the decision, unless called in under Rule 7 of the Budget and Policy Framework Procedure Rules or Rule 12 of the Scrutiny and Overview Committee Procedure Rules. Where consent has been obtained to exempt the decision from call-in, this will be specified below. Only key decisions of an officer are subject to call-in.

Decision Taker	Joint Director of Planning and Economic Development
Subject Matter	Foxton Neighbourhood Plan - response to consultation on the submission
	plan
Ward(s) Affected	Foxton
Date Taken	04 February 2021
Contact Officer	Alison Talkington Senior Planning Policy Officer Contact: <u>Alison.Talkington@greatercambridgeplanning.org</u> / 01954 713182 /mobile 07514 926521
Date Published	09 February 2021
Call-In Expiry/Exempt from call-in	16 Feb 2021
Key Decision?	No
In Forward Plan?	No – delegated decision for Lead Cabinet Member for Planning
Urgent?	Decision must be made by 23 February 2021

## Purpose / Background

## Purpose

1. The purpose of this report is to agree the Council's response to the public consultation on the submission version of the Foxton Neighbourhood Plan. The consultation runs for 6 weeks from 12 January until 23 February 2021.

## Background

- 2. The Foxton Neighbourhood Area was designated on 17 November 2015.
- 3. Officers provided informal comments on earlier drafts of the Neighbourhood Plan ahead of the formal pre-submission consultation process and recognise the hard work that those on the steering group of the neighbourhood plan have put into preparing the Plan. This group has strived to ensure that the whole village had an opportunity to have an input into the final Plan.
- 4. A Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening was undertaken on a draft version of the Neighbourhood Plan, and a screening determination was published in June 2019.
- 5. Pre-submission public consultation on the draft Neighbourhood Plan was undertaken by the Parish Council from 15 May to 26 June 2019. Officers provided a formal response to the consultation, providing constructive comments about the Neighbourhood Plan to assist the neighbourhood plan group with finalising the Neighbourhood Plan. Officers have met with the steering group to discuss how these comments and the current submitted Plan has taken most of them into account. The parish has taken their plan forward in a positive way.
- 6. On 10 February 2020, Foxton Parish Council submitted their Neighbourhood Plan to SCDC. Officers have confirmed, as set out in the Legal Compliance Check for the Neighbourhood Plan that the submitted version of the Neighbourhood Plan and its accompanying supporting documents comply with all the relevant statutory requirements at this stage of plan making. Public consultation on the submitted Neighbourhood Plan was begun on 10 March 2020. However, this consultation had to be suspended due to the onset of the Covid-19 pandemic and the restrictions this imposed on how we could meet the national regulatory requirements regarding neighbourhood plan consultations.
- 7. As the impact of the Covid-19 pandemic continued into the autumn we had to consider how we could adapt our public consultations on neighbourhood plans to ensure everyone's safety whilst still complying with current national regulations. To ensure this we decided that anyone wishing to inspect a hard copy of neighbourhood plan documents out for consultation would be able to request a copy by contacting the Planning Policy Team. Our Statement of Community Involvement has been updated to reflect this change in how we make documents available to the public for inspection. We therefore were able to resume the consultation on the Foxton Neighbourhood Plan from 12 January until 23 February 2021.
- 8. Officers, in conjunction with Foxton Parish Council, have appointed an independent examiner to consider this Neighbourhood Plan. All comments submitted during the public consultation on the submission version of the Neighbourhood Plan will be provided to the examiner for their consideration.

## Considerations

- 9. The Foxton Neighbourhood Plan has been prepared by Foxton Parish Council to provide planning policies for development in the area, with the aim of providing greater clarity when determining planning applications in the area. The Neighbourhood Plan includes 20 planning policies that cover a range of issues including:
  - (i) Maintaining and enhancing the rural character, heritage assets and local distinctiveness.
  - (ii) Improving the built-up environment of Foxton where opportunities arise.
  - (iii) Protecting and enhancing the special landscape character and green spaces including biodiversity assets.
  - (iv) Supporting modest growth where this growth contributes towards meeting local housing needs.
  - (v) Retaining existing community infrastructure and securing improved provision of facilities.
  - (vi) Protecting and increasing formal and informal recreation open space.
  - (vii) Improving the non-motorised path network for recreational usage.
  - (viii) Providing appropriate high-value local employment.
  - (ix) Encouraging walking, cycling and use of public transport rather than use of cars.
  - (x) Maximising benefit to village if a travel hub is created and/ or closure of the level crossing.
  - (xi) Reducing impact of traffic in village and improving safety.
  - (xii) Ensuring the area adjacent to the station is redeveloped in a coherent way.
- 10. To successfully proceed through its examination to a referendum, a Neighbourhood Plan must meet a number of tests known as the 'Basic Conditions'. These tests are different to the tests of soundness that a Local Plan must meet. The Basic Conditions are set out in national planning guidance and are summarised as follows:
  - (a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the Neighbourhood Plan.
  - (b) the making of the Neighbourhood Plan contributes to the achievement of sustainable development.
  - (c) the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area.
  - (d) the making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations; and
  - (e) prescribed conditions are met in relation to the Neighbourhood Plan, including that the making of the neighbourhood plan is not likely to have a significant effect on a European wildlife site or a European offshore marine site either alone or in combination with other plans or projects.
  - (f) the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

Our Neighbourhood Planning Toolkit includes Guidance Note 11 (What are the Basic Conditions and How to Meet Them), which sets out further details on each of the Basic Conditions. When a Neighbourhood Plan is submitted to the local planning authority it must be accompanied by a Basic Conditions Statement that sets out how the Parish Council considers that their Neighbourhood Plan meets the Basic Conditions.

- 11. When considering a Neighbourhood Plan, the examiner will assess whether or not the Neighbourhood Plan meets the Basic Conditions. When an examiner recommends that the Neighbourhood Plan should proceed to referendum (if it meets the Basic Conditions, with or without modifications), the examiner's report must also set out whether the referendum area should be extended beyond the neighbourhood area. Comments made during the current consultation on the submission version of the Neighbourhood Plan, which will be provided to the examiner for their consideration, should therefore address whether the submitted Neighbourhood Plan meets the Basic Conditions and can also address whether the referendum area should be extended beyond the neighbourhood area.
- 12. SCDC is fully supportive of Parish Councils bringing forward Neighbourhood Plans for their areas, including Foxton Parish Council's decision to prepare a Neighbourhood Plan, and officers have been supporting the Parish Council in the plan's preparation. The Council's proposed response to this public consultation on the submission version of the Neighbourhood Plan is set out in Appendix 1.
- 13. SCDC is supportive of the aims of the Foxton Plan and our comments are intended to help the Plan to be successful at examination as well as delivering policies that are clear in their meaning and are unambiguous in their interpretation. SCDC recognise the achievement of Foxton PC in reaching this stage of submitting their Plan to us for examination.
- 14. If the examiner is minded to recommend that the Neighbourhood Plan should proceed to referendum, the Council does not feel that the referendum area needs to be extended beyond the designated Neighbourhood Area as the planning policies included in the plan would not have a substantial, direct or demonstrable impact beyond the parish.

## **Declaration(s) of Interest**

Record below any relevant interest declared by any executive Member consulted or by an officer present in relation to the decision. None

# Dispensation(s)

In respect of any conflict(s) of interest declared above, record below any dispensation(s) granted by the Council's Standards Committee. None

## Consultation

Record below all parties consulted in relation to the decision.

Ward Councillor

## Other Options Considered and Reasons for Rejection

The option of not sending a response from SCDC was rejected as this Council has a duty to provide advice and assistance to groups preparing neighbourhood plans.

Final decision	Reason(s)	
To agree the response from SCDC set out at Appendix 1	The response is intended to provide the independent examiner with SCDC's comments on the Foxton Neighbourhood Plan.	

Signed	Name (CAPITALS)	Signature	Date
Lead Cabinet Member (where required by the Constitution)	Cllr Tumi Hawkins	T. Hawkins	4 February 2021
Chief Officer/Head of Service	Stephen Kelly	SJ Kelly	4 February 2021

## **Further Information**

Appendix 1: SCDC response to the Foxton Submission Neighbourhood Plan

## APPENDIX 1

## South Cambridgeshire District Council's response to the consultation on the submission Foxton Neighbourhood Plan

- 1. South Cambridge District Council (SCDC) is taking the opportunity to provide the examiner of the Foxton Neighbourhood Plan with the local planning authority's comments on the submission version of the plan.
- 2. SCDC has worked closely with Foxton Parish Council (PC) as they have been preparing their plan. We appreciate the hard work that has gone into getting their neighbourhood plan this far along the process. There have been many meetings with the neighbourhood plan team to discuss the plan as it has evolved. SCDC has provided constructive comments to the team at these meetings followed up by detailed notes to assist them in their plan making.
- 3. SCDC is pleased that many of the comments that were made during the pre-submission consultation (Regulation 14) have resulted in changes to the Submission version of the Foxton Neighbourhood Plan. The comments contained in this Appendix are identified either as matters that relate directly to whether, in our opinion, the Plan meets the Basic Conditions or as matters that would help the use of the Plan in practice. Those comments relating to meeting the Basic Conditions test are identified as follows (BC test) and the other comments as (Non-BC test))

## Mapping – (BC Test)

- 4. In earlier comments to the Foxton Plan we had asked the Parish Council to consider having larger scale maps to cover the whole of their parish to provide a comprehensive Policies Map maybe at A3 scale so that it is easy to read. Figures 30A and 30B remain at a small scale that make it difficult to define the precise boundaries of designations.
- 5. Alternatively, we had suggested that the Parish Council could consider the approach used in our Local Plan Policies Map where individual villages can be covered by several A4 maps at legible and easy to read scales.
- 6. Figures 11i-11v could benefit from each being A4 size with crisp boundaries. The keys all have become somewhat blurry. Also, the Ordinance Survey mapping copyright is indistinct on all these maps.

## Comments on the planning policies –

Chapter 5 Environment and local character: built and natural

- 7. Policy FOX2 Sustainable Design and Construction
  - Supportive of the intentions of the policy it is ambitious and does take things a step on from the current policies in the Local Plan. However, we have comments around the implementation of the policy and its clarity. (BC test)

- It is not clear how the information required should be provided within an application. The nature of the application itself could impact on how this can be demonstrated . We would suggest that the policy wording is amended to read as follows:
  - 'Where appropriate, developments proposals should include demonstrate how the following are achieved:' (BC test)
- We consider it doubtful whether, as written, the Policy is compliant with the Written Ministerial Statement dated 25 March 2015 and which remains in force. It states that neighbourhood plans should not set out any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.
- The policy calls for new development to target 'zero carbon emissions'. We consider that "zero carbon emissions" needs to be defined, perhaps by adding the definition to the glossary. The policy needs to clearly state what evidence would need to be submitted to show compliance with the policy. (BC test)
- Bullet point 3 Technically speaking this refers to 'fabric efficiency' measures rather than 'energy efficiency' measures so we suggest 'energy efficiency' be replaced by 'fabric efficiency'. (BC test)
- Bullet point 4 BREEAM 'excellent' can be quite hard to achieve for small nonresidential development (from a cost perspective rather than technical feasibility). Should this requirement relate to major non-residential (i.e. 1,000m2 and above) and then consider a more tailored approach for smaller scale nonresidential development that doesn't require an army of consultants to deliver? (BC test)
- Bullet point 6 This does not add specific local considerations to the existing Local Plan Policy NH/15. However we would suggest that if this element of the policy is to be retained, it is tightened as follows: '*Retrofit to reduce energy demand, and generation of renewable energy, are encouraged where appropriate and where such measures safeguard the character and appearance of designated and nondesignated heritage assets.*' (BC test)
- Bullet point 7 We suggest for clarity that this bullet point is amended to read as follows "All proposals must demonstrate how they accord with the principles set out in the Greater Cambridge Sustainable Design and Construction SPD, which was adopted in January 2020". (BC test)
- It is unclear how much evidence there is to support this policy and what impact it would have on the future viability of developments within the village. Achieving zero carbon emissions will have cost implications. (BC test)

## 8. Policy FOX/4 Heritage Assets and their setting

- The first paragraph of this policy repeats the Local Plan Policy NH/14 about heritage assets which is one of our strategic policies. (BC test)
- The non-designated assets have been shown on the Policies Map which is to be welcomed but they are shown as a letter not showing the extent/boundaries of the asset. For clarity the boundaries of each asset should be shown not just a letter. (BC test)
- Whilst recognising that the non-designated heritage assets were included in the Foxton Conservation Area Appraisal the Plan would have benefited from having included a description of each asset and reasons for its inclusion as an appendix. (BC test)
- On Figure 13 it is unclear what status the built features shown on the map as red asterisks and identified from A-E are within the neighbourhood plan. (Non-BC test)
- Harm is detailed in the Policy, but there is no indication of what harm is or where this definition has been sourced from, this is then not reflected in the supporting text. If this is to refer to the NPPF level of harm, then it should be referred to. (BC test)

9.	Policy FOX/5 Protect and Enhance Foxton's Landscape Character
	<ul> <li>The policy implies that it will be all scales of development that would need to be considered under this policy - is this the intention? (BC test)</li> </ul>
	• In the first bullet point mention is made of the terms 'hard edge' and 'blend'- these terms should be defined. (BC test)
	<ul> <li>Does the second bullet point about Green Belt sensitive edges add any locally</li> </ul>
	specific detail? There is a Local Plan policy that considers such land - Policy NH/8. (BC test)
	<ul> <li>Final section about development in the open countryside – what development would be expected here? There are Local Plan policies that cover this issue. E.g. Policy S/7 and Policy NH/3. (BC test)</li> </ul>
10.	Policy FOX/7 Protect and enhance green space
	<ul> <li>We previously had concerns about too many different terms being used to describe green open space as it can be confusing to use different terms that may mean different things to different people. The Plan would benefit from having a tighter description of open space that is to be protected through the plan. (BC test)</li> </ul>
	<ul> <li>In the supporting text to the policy paragraph 5.38 the fourth sentence states that Policy NH/12 of the Local Plan also applies to development proposals that could adversely impact upon the character of undesignated local green space. This is factually incorrect. This policy is specifically for Local Green Space identified in the Local Plan. (BC test)</li> </ul>
	<ul> <li>The policy does not need to repeat the protection given by Policy NH/12 and NH/11. (BC test)</li> </ul>
	<ul> <li>The policy states that development should avoid detrimental impact upon local green spaces within the <i>built-up area of the village</i> - does this mean within the development framework? Also, this term appears to be allocating areas that are not identified on the map and within the other definitions in the policy. (BC test)</li> <li>The Policy should refer to the Conservation Area "Appraisal" rather than Assessment. (BC test)</li> </ul>
	Delieur FOV/0 Die diversity and New Development
11.	<ul> <li>Policy FOX/8 Biodiversity and New Development</li> <li>This is somewhat repeating the biodiversity policies in the Local Plan (BC test)</li> <li>Supporting paragraph 5.5 states that there are no biodiversity designated sites within the Parish boundary; however, the River Rhee/Cam which forms the northern boundary of the Parish is designated as a County Wildlife Site. This should be included within the paragraph.</li> </ul>
	<ul> <li>In the policy references to 'net gain in biodiversity' should be changed to 'measurable net gain in biodiversity' as per paragraph 174 (b) and 175 (d) of the National Planning Policy Framework 2018. The difference between 'net gain' and 'measurable net gain' is considerable. (BC test)</li> </ul>
	ter 6 - Housing
12.	Policy FOX/9 Redevelopment of old school/chapel site on Station Road.
	<ul> <li>This policy states that the new dwellings are to be designed and built to the M4(2) standards. We understand that the Written Ministerial Statement 25 March 2015 is still in force and states that neighbourhood plans should not set out any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.</li> </ul>
	<ul> <li>An Examiner for a neighbourhood plan elsewhere has indicated "My understanding is that Part M of the Building Regulations requires that all new dwellings to which Part M of the Building Regulations applies should be designed to a minimum of M4(1) 'visitable dwellings' and that local authorities can opt into, or 'switch on', requirements for M4(2) and M4(3) via Local Plan policy. However, it is clear from</li> </ul>
	the WMS that neighbourhood plans cannot set this standard."