

Cottenham Neighbourhood Plan - submission consultation

C - 67635 - 16870 - Foreword, Contents and Figures - None

67635 Comment

Foreword, Contents and Figures

Foreword, Contents and Figures

Respondent: Ms Christine Ward [16870]

Agent: N/A

Full Text: I support this Neighbourhood Plan overall

Summary: I support this Neighbourhood Plan overall

Attachments:

Cottenham Neighbourhood Plan - submission consultation

C - 67640 - 27647 - Chapter 1 Context - None

67640 Comment

Chapter 1 Context

Chapter 1 Context

Respondent: National Grid (Mr Spencer Jeffries) [27647]

Agent: Wood Plc (Lucy Bartley) [28595]

Full Text:

Summary:

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.

Attachments:

Response

Planning Policy Team
SCDC
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA



Tel: 01926 439116
n.grid@woodplc.com

Sent by email to:
neighbourhood.planning@scamb.gov.uk

26 February 2019

Dear Sir / Madam

**Cottenham Neighbourhood Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has **no record** of such apparatus within the Neighbourhood Plan area.



Electricity Distribution

The electricity distribution operator in South Cambridgeshire Council is UK Power Networks. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

Appendices - National Grid Assets

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. [REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

Wood E&I Solutions UK Ltd
Nicholls House
Homer Close
Leamington Spa
Warwickshire
CV34 6TT

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
Warwickshire
CV34 6DA

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

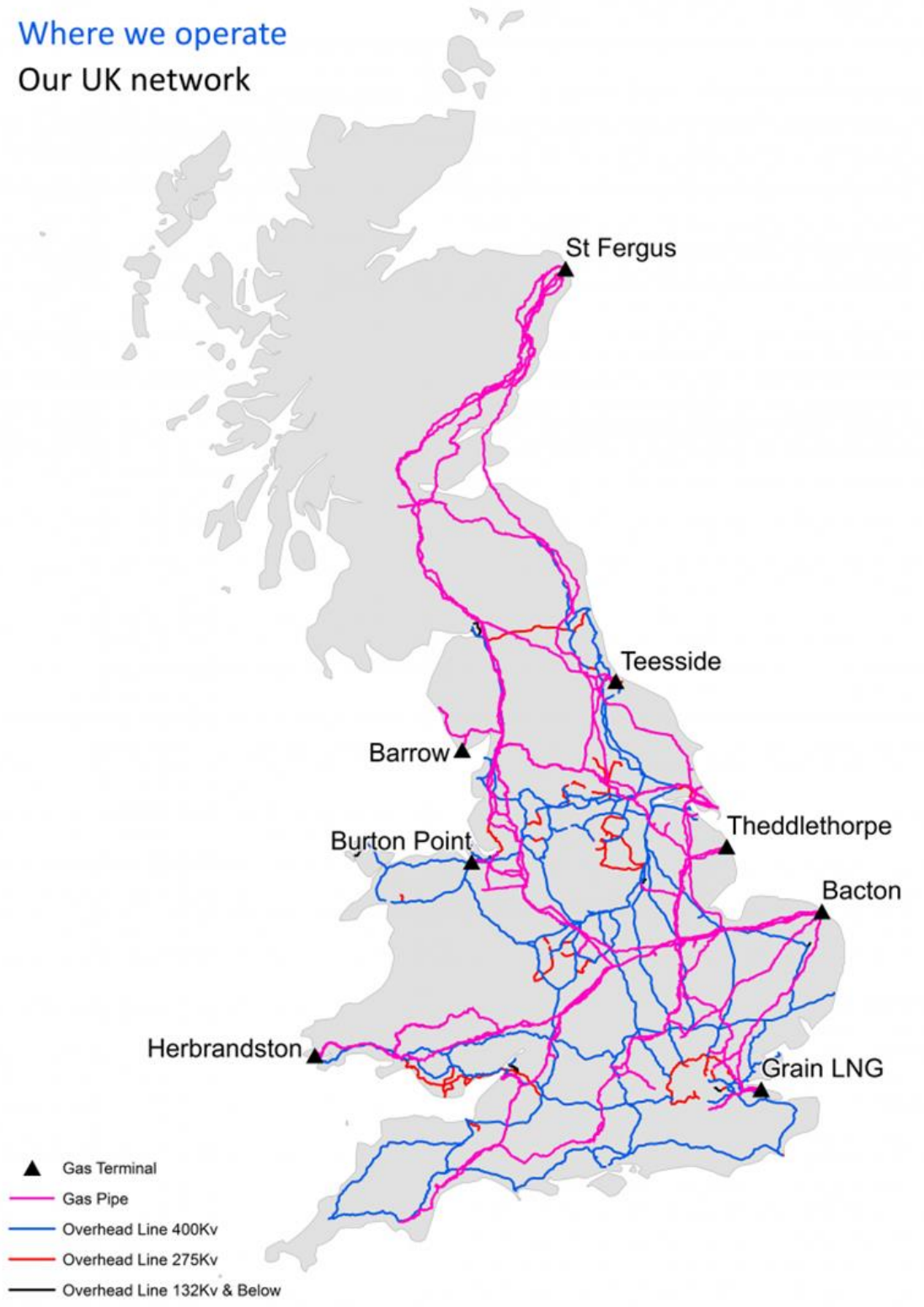
Yours faithfully

[via email]
Lucy Bartley
Consultant Town Planner

cc. Spencer Jefferies, National Grid

APPENDIX 1: WHERE NATIONAL GRID'S UK NETWORK

Where we operate
Our UK network



Cottenham Neighbourhood Plan - submission consultation

S - 67643 - 9390 - Chapter 1 Context - None

67643 Support

Chapter 1 Context

Chapter 1 Context

Respondent: Cambridgeshire Constabulary (Carol Aston) [9390] Agent: N/A

Full Text: This office submitted comments last year to Cottenham Parish Council during their consultation period, under the reference 412/18 - I have today reviewed them and wish them to be carried forward as our feedback on the current consultation. I have replicated them below

Our Ref: Cambs CPDT 412/18

Cottenham Neighbourhood Plan - comments

I am one of two Designing out Crime Officers, employed with Cambridgeshire Police. Our job involves working with architects, developers and the planning departments across Cambridgeshire using our expertise to 'design out crime' thus promoting community safety and reducing vulnerability to crime. I have read the proposed Cottenham Neighbourhood Plan and am happy to support its content. I would wish the following comment from our office to be recorded please:

Changes to English Planning and Building Control Regulations have underlined the importance of the Police advice delivered in the form of the Secured by Design (SBD) initiative. We seek to reinforce the need and importance of a safe and secure external environment. SBD incorporates the latest security standards, developed to address emerging criminal methods of attack, and includes references to both building regulations and other statutory requirements across the UK. The guidance also serves the legacy needs of the outgoing Code for Sustainable Homes. Based on sound research findings proves that SBD delivers a significant reduction in crime and cost efficiency savings for a wide range of stakeholders, including local authorities, housing associations, landlords, residents and the Police service.

Under the National Planning Practice Guidance the government has reiterated that designing out crime and designing in community safety should be central to the planning and delivery of new development. Local authorities are duty bound to adhere to Section 17 of the Crime and Disorder Act 1998 and exercise their functions with due regard to their likely effect on crime and disorder. The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation.

This office is happy to consult with developers to ensure that all plans for future development in Cottenham enhance the principles of Secured by Design fully and we are especially happy to work with them to encourage applications for Secured by Design accreditation in all new developments

Summary: Outlines the importance of designing out crime from new developments thus promoting community safety and reducing vulnerability to crime.

Happy to consult with developers to ensure that all plans for future development in Cottenham enhance the principles of Secured by Design fully and we are especially happy to work with them to encourage applications for Secured by Design accreditation in all new developments

Attachments:

Cottenham Neighbourhood Plan - submission consultation

C - 67644 - 25133 - Chapter 1 Context - None

67644 Comment

Chapter 1 Context

Chapter 1 Context

Respondent: Essex County Council (Mr Matthew Jericho) [25133] **Agent:** N/A

Full Text: Thank you for notifying Essex County Council of this consultation.
ECC makes no comments.

Summary: Thank you for notifying Essex County Council of this consultation.
ECC makes no comments.

Attachments:

Cottenham Neighbourhood Plan - submission consultation

S - 67652 - 7119 - Chapter 1 Context - None

67652 Support

Chapter 1 Context

Chapter 1 Context

Respondent: Campaign to Protect Rural England (CPRE) (Mrs Jane Williams) [7119] **Agent:** N/A

Full Text:

Summary: CPRE support Cottenham Parish Council's draft Neighbourhood Plan. Once made and considered alongside South Cambridgeshire's adopted Local Plan it will give the community an improved legal framework with which to enhance, protect and support parishioners, local business, the environment and biodiversity within the Designated Area of the Plan.

Attachments:
Response form

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)

- SUPPORT**
- OBJECT**
- COMMENT**

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.

General Comment:

CPRE support Cottenham Parish Council's draft Neighbourhood Plan. Once made and considered alongside South Cambridgeshire's adopted Local Plan it will give the community an improved legal framework with which to enhance, protect and support parishioners, local business, the environment and biodiversity within the Designated Area of the Plan.

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 25 MARCH 2019 AT:

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

EMAIL: neighbourhood.planning@scambs.gov.uk

Cottenham Neighbourhood Plan - submission consultation

C - 67653 - 1819 - Chapter 1 Context - None

67653 Comment

Chapter 1 Context

Chapter 1 Context

Respondent: Hertfordshire County Council (Mrs Jan Hayes-Griffin) [1819]

Agent: N/A

Full Text:

Summary: No comments to make on the neighbourhood plan.

Attachments:

Representation



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

GROWTH & INFRASTRUCTURE
Hertfordshire County Council
County Hall CHN 114
Hertford SG13 8DN

Sent by email to: neighbourhood.planning@scambs.gov.uk



Date: 22 March 2019

Dear Sir/Madam,

Cottenham Parish Council – Neighbourhood Plan Consultations 2019

Thank you for the opportunity to comment on the Cottenham Neighbourhood Plan consultation document prior . This letter relates to the services of the Environment & Infrastructure Department, which also incorporates other services provided by the county council where relevant.

Having reviewed the content of the documents published online, HCC do not consider that consultations have an impact on HCC services and as such do not have comments to make.

We look forward to working with you regarding further consultations.

Yours sincerely,

David Hodbod
Senior Planning Officer
Growth & Infrastructure Unit
Hertfordshire County Council

Cottenham Neighbourhood Plan - submission consultation

C - 67669 - 28090 - Chapter 1 Context - None

67669 Comment

Chapter 1 Context

Chapter 1 Context

Respondent: South Cambridgeshire District Council (Stephen Kelly) [28090] Agent: N/A

Full Text:

Summary:

General overarching comments on whole Neighbourhood Plan as follows:

Important to have clear and unambiguous policies that decision maker can apply consistently and with confidence when determining planning applications.

Need for Proposals Map for a complex plan like Cottenham Plan. Concerns about many of the figures used in the Plan.

Supporting text and justification for policies lacking.

Concern about how Village Design Statement SPD has been incorporated into the Plan.

AECOM's assessment work suggested need for further work and clear evidence to support why sites within the Plan.

Suggest amending policy and paragraph numbering.

Concerns about criteria based policies and car parking requirements.

Attachments:

Response form
Decision Notice

**SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL
RECORD OF EXECUTIVE / CHIEF OFFICER DECISION**

This form should be used to record key and other decisions made by individual Portfolio Holders and key decisions made by Chief Officers. 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.

Unless permission has been obtained from the Chairman of Council and the Chairman of the Scrutiny and Overview Committee that this decision be treated as a matter of urgency under Rule 12.19 of the Scrutiny and Overview Committee Procedure Rules, this 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.

Portfolio	Planning
Subject Matter	Cottenham Neighbourhood Plan - response to consultation on the submission plan
Ward(s) Affected	Cottenham
Date Taken	18 March 2019
Contact Officer	Alison Talkington Senior Planning Policy Officer Contact: Alison.Talkington@scamb.gov.uk / 01954 713182
Key Decision?	No, however it was first published in the February 2019 Forward Plan
In Forward Plan?	No – delegated decision for Lead Cabinet Member for Planning
Urgent?	Decision must be made by 25 March 2019

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 Cottenham Neighbourhood Plan. The consultation runs for 6 weeks from 11 February to 25 March 2019.
Background	
2.	Cottenham Parish Council considered in early 2015 the idea of developing a Neighbourhood Plan to provide a more locally focussed set of policies for their parish. An application to designate the whole of their parish as a Neighbourhood Area was submitted to SCDC in September 2015 and the Cottenham Neighbourhood Area was designated on 17 November 2015.
3.	Cottenham Parish Council carried out consultation on a draft Neighbourhood Plan in 2017. Officers provided informal comments on the draft Neighbourhood Plan, and on subsequent revisions to the plan that were shared with officers ahead of the formal pre-submission consultation process. 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 September 2018.
4.	Pre-submission public consultation on the draft Neighbourhood Plan was undertaken by the Parish Council from 19 June until 7 August 2018. 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.

5. On 15 January 2019, Cottenham Parish Council submitted their Neighbourhood Plan to SDCD. 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 is therefore being undertaken between 11 February and 25 March 2019.
6. Officers, in conjunction with Cottenham Parish Council, are in the process of selecting and appointing 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

7. The Cottenham Neighbourhood Plan has been prepared by Cottenham 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 22 planning policies that cover a range of issues including:
 - (i) Conserving the character of the village
 - (ii) Providing more housing
 - (iii) Improving amenities and facilities
 - (iv) Encouraging employment
8. 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.

9. 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.

10. SCDC is fully supportive of Parish Councils bringing forward Neighbourhood Plans for their areas, including Cottenham 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 (as set out in Appendix 1) reiterates and supplements comments made previously by officers, both formally during the pre-submission consultation and informally on earlier versions of the plan, where they remain relevant and appropriate.
11. SCDC is supportive of the aims of the Cottenham 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 Cottenham PC in reaching this stage of submitting their Plan to us for examination.
12. SCDC considers that a number of the policies in the submission version of the Neighbourhood Plan, would need to have some amendments made to them for the Plan to be capable of meeting the Basic Conditions. These concerns are set out in the proposed response (see Appendix 1).
13. 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 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 Monitoring officer or Civic Affairs Committee.

None

Consultation

Record below all parties consulted in relation to the decision.

Ward Councillors

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 Cottenham Neighbourhood Plan.
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Signed	Name (CAPITALS)	Signature	Date
Lead Cabinet Member for Planning	Cllr Tumi Hawkins		
Lead Officer	Stephen Kelly		

Further Information
Appendix 1 : SCDC response to the Cottenham Submission Neighbourhood Plan

Appendix 1

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

1. South Cambridge District Council (SCDC) is taking the opportunity to provide the examiner of the Cottenham Neighbourhood Plan with the local planning authority's comments on the submission version of the plan.
2. SCDC has worked with Cottenham Parish Council (PC) as they have been preparing their plan. There have been a number of 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 supportive of the aims of the Cottenham 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 Cottenham PC in reaching this stage of submitting their Plan to us for examination.
4. The comments we have made on the Plan are provided in two sections
 - A. General overarching comments about particular issues that relate to the Plan as a whole
 - B. Comments which highlight particular/key issues with policies where it might be helpful if the plan were amended.

A - General overarching comments

Are the policies clear and unambiguous?

5. National planning practice guidance states that policies in a neighbourhood plan should be clear and unambiguous and be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications¹.
6. The importance of having clear policies is further emphasised in the guidance published by the Neighbourhood Planning Independent Examiner Referral Service (NPIERS) in March 2018. This guidance is supported by the Ministry of Housing, Communities and Local Government (MHCLG)². It states the checks that a qualifying body should make prior to submitting the plan to the local planning authority (See page 29)

1.7.1. A qualifying body should check that the policies in the plan are precise, and provide a basis for decision-making on planning applications. This is a key area where the local planning authority can help. Policies should generally be positive, rather than negative.

¹ (Paragraph: 041 Reference ID: 41-041-20140306)

² NPIERS Guidance to service users and examiners - <https://www.rics.org/globalassets/rics-website/media/upholding-professional-standards/regulation/drs/drs-services/npiers-planning-guidance-to-service-users-and-examiners-rics.pdf>

Policies must be justified. Evidence to inform the policies should be proportionate to the issues.

Proposals Map

7. Although it is acknowledged that a single Proposals Map is not a requirement for a Neighbourhood Plan, SCDC considers that, for complex Plans like Cottenham, such a map helps in providing clarity to those policies that include site allocations and site specific issues. The maps currently in the Plan are generally not referenced in a policy and, in some instances, are of such a scale that it is difficult to identify the boundaries or precise location of a designation.
8. The NPIERS guidance³ on examinations also mentions the importance of mapping in a neighbourhood plan. It sets out that the qualifying body should check the following prior to submitting a Plan to the local planning authority (Page 29):

*1.7.2. Plans should be supported by clear mapping, including:
Accurate delineation of the boundaries of the plan
The boundaries of any site allocations, and designations made in the plan (preferably including street names).*

9. In particular, we feel it would be helpful if site specific designations in the following policies were illustrated on a Proposals Map:
 - Policy COH/1-1 – Protecting vistas / viewpoints
 - Policy COH/1-3: Non designated heritage assets
 - Policy COH/1-6: Village character – the village core or centre
 - Policy COH/1-7: Local Green Space
 - Policy COH/1-8: Protected Village Amenity Areas
 - Policy COH/2-1: Development Framework
 - Policy COH/2-3: Use of brownfield sites for housing – policy refers to two maps within the plan (Figure 14 and 17).
 - Policy COH/3-1.1: Durman Stearn site
 - Policy COH/3-1.2: Co-op site
 - Policy COH/3-2.1: Watsons Yard
 - Policy COH/4-1.1: Recreation & Sports Hub
 - Policy COH/4-2: Multi-purpose Village Hall
 - Policy COH/4-3: Nursery
 - Policy COH/4-4: Sports facilities
 - Policy COH/6-1: Extension of burial grounds
 - Policy COH/7-3: New Durman Stearn site
10. SCDC has concerns about a number of the figures used in the Plan. Those that:
 - a) Do not clearly show boundaries of site specific policies;
 - i. Figure 9: Non designated heritage assets
 - ii. Figure 11: Cottenham focal points, core street, central area and centre
 - iii. Figure 12: Modified LGS boundaries at the Recreation Ground
 - iv. Figure 14: Cottenham's possible development sites
 - v. Figure 17: Brownfield housing sites within reasonable distance of centre

³ NPIERS Guidance to service users and examiners - <https://www.rics.org/globalassets/rics-website/media/upholding-professional-standards/regulation/drs/drs-services/npiers-planning-guidance-to-service-users-and-examiners-rics.pdf>

- vi. Figure 26: Preferred expansion of Recreation Ground
 - vii. Figures 27 & 28: Site Location for Village Hall and Nursery
- b) Are of too small a scale;
 - i. Figure 7 Listed buildings and scheduled monuments;
 - ii. Figure 11: Cottenham focal points, core street, central area and centre
 - iii. Figure 14: Cottenham's possible development sites
 - iv. Figure 17: Brownfield housing sites within reasonable distance of centre
 - c) Are lacking keys
 - i. Figure 5 National character area and Green Belt
 - d) Are not mentioned in the supporting text or policy
 - i. Figure 21: Durman Stearn site
 - ii. Figure 23: Co-op site
 - iii. Figure 25: Watsons Yard
 - e) Are wrongly referenced in the policy
 - i. Policy COH/3-2.1: Watson's Yard / Fire Station site (site X5 in Figure 14) – Policy states Figure 22 when it should be 24
 - ii. Policy COH/4-2: Multi purpose Village Hall – Figure 24 referred to when should be 27 or 28
 - iii. Policy COH/4-3: Nursery – Figure 25 referred to in policy be should be 27 or 28
 - iv. Policy COH/7-3: new Durman Stearn site – Figure 27 is referred to in the policy but it should be Figure 31
 - f) Those where a number of figures have been included twice with identical or different titles
 - i. Figure 15: Development Framework + Figure 16: Planning Permissions
 - ii. Figure 17 and 19: Brownfield housing sites within reasonable distance of centre
 - iii. Figure 27 and 28: Site Location of Village Hall and Nursery
 - g) Those that need the appropriate copyright details for use of the map
 - i. Figure 21.
 - ii. Figure 23
 - iii. Figure 25.

Supporting text / Justification for policies

11. There are a number of instances where criteria included within policies are not explained or justified in the supporting text. It is apparent that a considerable and worthwhile amount of work has been carried out to gather evidence as identified by the number of supporting evidence documents. However, it would help the Plan user if the salient points were summarised within the supporting text for each policy. Inclusion of such information would help to tell the story more clearly of why policies are included in the Plan and the reason for particular criteria requirements.
12. For policies in the Plan that add value to a Local Plan policy it would be helpful if the supporting text had referred to the relevant Local Plan policy. This would have helped put the Cottenham policy in context.

13. New policies have been added into the submission version of the Plan that were not in the pre-submission Plan which do not appear to have any evidence base relating to them. Specifically –
 - i. Policy COH/1-6: Village character – the village core or centre
 - ii. Policy COH/4-4: Sports facilities
14. Some of the evidence documents have not been updated to reflect that the Local Plan was adopted in September 2018 or they cross refer to Cottenham policies from earlier versions of the Plan. This makes it difficult to link the current policies to their evidence base.

Cottenham Village Design Statement Supplementary Planning Document

15. The Cottenham Village Design Statement (VDS) was adopted as SPD supporting a policy from the now superseded Local Development Framework. The Neighbourhood Plan could have taken the opportunity to provide some status to the Village Design Statement but, whilst some elements have been included in new policies in the Plan, it is still referred to as assisting with design considerations for future planning applications. The weight of this SPD is now reduced in determining planning applications since the new Local Plan was adopted. If the guidance within the VDS was to be retained it could have been incorporated within a Policy in the Plan to retain the weight it has had previously in guiding design considerations in planning applications.

AECOM's Assessment Work for the Plan

16. The Plan makes some mention of the work that AECOM has carried out to inform and provide an evidence base for the Plan.
 - ***Site Assessment:***

Many sites were assessed but the findings of this are not included in the supporting text to justify particular site specific policies. AECOM in their report had indicated that, for some sites, further work would need to be done with relevant officers at SCDC (e.g. highways, heritage). Further, AECOM highlighted that there will need to be clear evidence to understand why particular sites are eventually included in the Plan and that this information is clearly recorded in the evidence base to support the plan. This further information has not been provided for the Plan.

Policy and paragraph numbering

17. SCDC consider that, for clarity and ease of reference, the Plan could helpfully be re-structured to ensure that there is a continuous flow of paragraph numbers that relate to the chapter that they are in. It would also be helpful if the policy numbers were simplified to follow from Policy COH/1 through consecutively to COH/22.

B - Comments on Policies

18. There are some common issues that relate to a number of policies:
 - a) SCDC has concerns that many of the criteria based policies within the Plan are linked by 'and' which would mean that all criteria would have to be met by a development for it to comply with a policy. These policies do state the criteria are to be met 'where practicable.' In some instances, it could be onerous and perhaps unreasonable for a proposal to meet all the criteria. The Plan includes in Chapter 1 at paragraph 1.50 – 1.53 (Page 10) under the title 'Deliverability' an explanation about these criteria based policies. The Plan states that

such criteria should 'ideally' be met and that in some circumstances a 'concession' may be considered. However we consider that, if this is the intention of a particular policy, it would be helpful to specify so within the policy itself. The policies within the Plan that include such wording are –

- i. Policy COH/1-4: Village Character- alterations and extensions
- ii. Policy COH/1-5: Village Character – new build
- iii. Policy COH/2-2: Large Site Design
- iv. Policy COH/2-4: Locally affordable housing and CLT
- v. Policy COH/5-1: New Recreation Ground

- b) For many of the site specific policies, a criterion has been added referring to car parking requirements. Unless these on-site standards are different from those included in the adopted Local Plan in Policy TI/3 such a criterion is not required in the Plan. Is there local evidence to justify different parking standards in Cottenham?

19. The following section sets out SCDC's comments for each policy highlighting only the key issues where it may be helpful to amend the wording of the policy for clarity of meaning.

Chapter 4 Conserving village character

20. Policy COH/1-1: Landscape character

- a) SCDC supports the aim of the policy to protect views that contribute to the character and attractiveness of Cottenham. It would have been helpful if the selection of views had been supported by evidence setting out how the important views have been selected.
- b) It is not clear where criterion d) would apply as development can only provide planting within the application site. If this is the intention then we feel the policy should be clear in its wording.

21. Policy COH/1-2: Heritage Assets

- a) It would have assisted the understanding of the policy if evidence had been included to support why applications to demolish pre-1945 buildings are to be treated differently from other buildings in the Conservation Area. It is not clear whether these are the typical buildings described in paragraph 1-2a?
- b) The wording in the part a) of this policy is confusing. By linking the two elements of part a) of this policy with the word 'or' the policy as drafted could allow for buildings in a good state of repair to be demolished as long as the replacement building uses the reclaimed materials. Is this the intention of the policy?

22. Policy COH/1-3: Non-designated heritage assets

SCDC supports the identification of such assets in the Plan. We feel that a larger scale map showing clearly the location and extent of each asset would assist the user of the Plan to identify whether a proposal might impact on a building in the policy.

23. Policy COH/1-4: Village Character – alterations and extensions

It would have benefited the supporting text to this policy if both the Village Design Statement SPD and the AECOM Heritage and Character Assessment had been more fully referenced.

24. Policy COH/1-5: Village character – new build
SCDC support the overall object of this policy to provide guidance for new buildings so that they can enrich the character of Cottenham. However, the policy as written would result in a terrace of four dwellings potentially failing this policy despite such a proposal positively adding to the street scene. Is this the intent of the Policy?
25. Policy COH/1-6: Village character – the village core or centre
- a) This would benefit from a larger scale map to identify clearly the four focal points in the village. Figure 11 is of too small a scale.
 - b) It is difficult to see how the criteria in the policy will be achieved as many of the requirements are not deliverable as they are reliant on others to deliver (E.g. County highways). Also the focal points and centre are within the village core with limited space for extra features.
 - c) The identification of the four focal points was not included in the Regulation 14 consultation and it is unclear as to whether the local community has not had the opportunity to comment on the policy or the focal points identified.
26. Policy COH/1-7: Local Green Space (LGS)
- a) SCDC welcomes the policy but its wording is not clear. The policy includes both a revised boundary to a LGS designated in the Local Plan and a new LGS assessed in the neighbourhood plan. The justification for both of these sites is included in the supporting text to the policy which is to be welcomed.
 - b) The supporting text does not mention the adopted LGS policy NH/12 in the Local Plan which would help to put in context this specific local policy.
 - c) It would help the understanding of the policy greatly if a larger and more detailed map was included to identify both LGSs - the revised boundary for the Recreation Ground and the new boundary for the Les King Wood – Figure 12 is very confusing.
27. Policy COH/1-8: Protected Village Amenity Areas (PVAA)
- a) The supporting text to this policy would benefit from having mention of the relevant policy in the Local Plan - Policy NH/11: Protected Village Amenity Areas.
 - b) There does not appear to be a justification for including The Dunnocks as a new PVAA. It does not appear in the VDS as open space valued by the community.

Chapter 5 Providing more housing

28. Policy COH/2-1: Development Frameworks
SCDC considers that the Local Plan policy that designates a Development Framework is a strategic policy and that amendments to the development framework of a village is not one for a neighbourhood plan to include. Changes to a framework boundary to reflect current and future proposed growth on the edge of a village will be considered in a future review of the Local Plan
29. Policy COH/2-2: Large Site Design
Whilst welcoming the aim of this policy to provide design guidance for large sites in Cottenham, there are criteria that identify locally specific requirements without providing justification for them

- i. Criterion c) relates to play space – LEAP which is different from the requirement in the Local Plan - Policy SC/7: Outdoor Play Space, Informal Open Space and New Developments and Figure 10 which provides a guide for the on-site provision of open space (pages 207-211). This criterion could result in the development having a lesser provision of open space – is this the intention of the policy?
- ii. Criterion d) relates to the distribution of affordable houses. In the Local Plan Policy H/10 for affordable housing it mentions that this sort of housing should be in small groups or clusters distributed throughout the site. It is not clear that there is locally supported evidence to support the neighbourhood plan approach to have individual affordable houses pepper potted through a site?

30. Policy COH/2-3: Use of brownfield sites for housing

- a) SCDC considers that this policy would seem to repeat the site-specific policies for these three sites and it is not sure what the policy adds to the Plan?
- b) The total housing potential in the table (page 41) is 24. If Durman and Watson’s site come forward first with a total of 15 then is it the intention of the Plan that the Co-op site cannot provide any housing as it would be in excess of the 15 total specified in the policy.
- c) As this is a policy allocating sites, it is unusual for two figures to be identified in a policy to show the location of any sites. Neither maps shows clearly the boundary of the three sites and are at too small a scale. If Figure 4 is the Site Specific Policies Map for the Plan then we recommend this should be referred to in the policy.

31. Policy COH/2-4: Locally affordable housing and CLT

We feel that this policy could be misinterpreted to imply that it is promoting housing development in the open countryside. In criterion a) it states that homes are located on sites *near* or immediately adjacent to Cottenham’s development framework boundary. We feel that the term “*near*” would need to be defined very precisely. Developers could see this as an opportunity to propose sites well away from the existing built area of the village of Cottenham which would be contrary to national and local plan policy. Would a preferable term be ‘adjoining’ to the framework? This would conform to the wording in the Local Plan policy on rural exception sites (Policy H/11)

Chapter 6 Improving Amenities and Facilities

32. Policy COH/3.1: Medical & Drop-in & Chat Centre

We are unclear as to how the policy adds to the Plan, given that potential sites are identified in Policies COH/3-1.1 and COH/3-1.2, unless other sites come forward. In this case, the policy does not help determine where such sites might be or the requirements of a medical centre other than it must be in a central location.

33. Policy COH/3-1.1: Durman Stearn site (site X4 as shown on Figure 14)

- a) SCDC welcomes Figure 20 which shows the site location. However Fig

- b) Figure 21, showing indicative redevelopment, is also included in the Plan. The Plan would be clearer if the policy or supporting text explained its status.
- c) SCDC considers that there is a lack of clarity concerning housing numbers when compared to Policy COH/2-3.
- d) There is a current planning application for this site - Ref S/4698/18/OL

34. Policy COH/3-1.2: Co-op site (site X6 as shown in Figure 14)

- a) SCDC welcomes Figure 22 which shows the site location however Figure 23 showing indicative redevelopment is also included but not mentioned in policy or supporting text. The Plan would be clearer if the policy or supporting text explained its status.
- b) There is a lack of clarity concerning housing numbers when compared to Policy COH/2-3

35. Policy COH/3-2: Supermarket

We consider that this policy somewhat duplicates Local Plan Policy E/22: Applications for new Retail Development and we are unsure as to what this policy adds that is specific to Cottenham other than that it allows for residential uses on upper floors of a supermarket?

36. Policy COH/3-2.1: Watson's Yard / Fire Station site (site X5 in Figure 14)

- a) SCDC is concerned that this site is not big enough for all the uses that are proposed for the site. Figure 25 showing indicative redevelopment is included in the Plan but not mentioned in the policy or supporting text. The Plan would be clearer if the policy or supporting text explained its status.
- b) As this is the only site being proposed for a supermarket, is it necessary to have COH/3-2 too?
- c) There is a lack of clarity concerning housing numbers when compared to COH/2-3

Policies COH/4-1.1; COH/4-2; COH/4-3 and COH4-4

37. There are many policies relating to potential development in and around a concentrated area in the village and it is difficult to understand clearly the story of all the existing and proposed uses. It would be very helpful if there was a comprehensive large scale map or series of maps included in the Plan illustrating all the uses and how they relate to one another.

38. Policy COH/4-1.1: Recreation and Sports Hub

- a) This policy has been introduced following the Regulation 14 consultation. The supporting text does not help to explain the hub and all the proposed uses for the area and therefore its interpretation into planning decisions could be compromised.
- b) Figure 27 does not clearly show the different uses and the boundaries for each use at the Recreation Ground.

39. Policy COH/4-2: Multi-purpose Village Hall + Policy COH/4-3: Nursery

- a) It is noted that a planning application for the Nursery was approved 20 December 2018 Ref S/2705/18/FL and for the Village Hall on 21 September 2018 Ref S/2702/18/FL. The supporting text could be helpfully updated to clarify this situation.

- b) The maps to show where these uses will be located are not clear. Figure 26 and 27/28 contradict each other. Fig 26 shows a larger site that will accommodate both uses.
40. Policy COH/4-4: Sports Facilities
- a) This policy would benefit from having a clear map to show the proposed allocation for the sports facilities. Figure 26 is confusing if you are not familiar with this part of the village.
 - b) SCDC has concerns about the impact on residential amenity in relation to criterion d) which seeks floodlit outdoor sports facilities. The site is adjacent to a recent residential planning consent and therefore floodlighting could have a significant detrimental impact without very careful design consideration. It could also have a detrimental impact on the wider fen edge. Policy COH/1-1 requires “subdued lighting on the village edge.
41. Policy COH/5-1: New Recreation Ground
- a) It is unclear why Policy COH/4-4 has been given 5 years to be fully achieved? Whilst recognising that additional recreation facilities will be required by the growing population of Cottenham there is a lack of evidence to support the 5-year deadline for the land adjacent to the Recreation Ground. This is not mentioned in the policy relating to this site – COH/4-4.
 - b) Whilst recognising that more recreation land is required, the Plan is not clear at explaining where this would be found if not adjacent to the existing recreation ground. Criteria d) implies it would be to the south-east of the village? If this is what is intended then perhaps it should be made clearer?
42. Policy COH/6-1: Extension of burial grounds
- SCDC welcomes the inclusion of this policy to ensure that there is adequate burial land within the village. As worded the policy is not clear whether it is actually allocating sites or providing criteria for the consideration of new sites? The supporting text (para 6-1d) refers to extensions or provision of new space but the policy only refers to extensions.

Chapter 7 Encouraging Employment

43. Policy COH/7-1: Village Employment
- While this approach is supported, we would question whether such an approach is achievable given the shortage of suitable land for providing additional car parking. Is it feasible to require sites in such a tight knit village core to provide on-site parking?
44. Policy COH/7-2: Rural employment
- a) As currently worded, the policy allows any proposals that increase rural employment and there is no indication of the scale of development or whether the proposal is on a brownfield site. It is not clear whether this policy applies to any site outside the Development Framework? If it does, then the sustainability of such a policy is questioned as it may not conform to the NPPF
 - b) The employment policies in the Local Plan could cover the aspirations of this policy.
45. Policy COH/7-3: new Durman Stearn site (X11 in Figure 14)

- a) The site is located in the Green Belt and the proposal is potentially contrary to Green Belt policies. The Local Plan does not allow for amendments to be made to the Green Belt in Cottenham. There would have to be very special circumstances to include a policy in the Plan within the Green Belt
- b) There is a current planning application for this site - Ref S/4747/18/OL

Cottenham Neighbourhood Plan - submission consultation

C - 67639 - 28250 - Chapter 4 Conserving the village character - None

67639 Comment

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: Historic England (Edward James) [28250]

Agent: N/A

Full Text:

Summary:

We welcome the production of this neighbourhood plan, and are pleased to note that the historic environment of the parish is referred to throughout as well as specifically in Section 4. Aside from congratulating those involved however, we do not wish to provide detailed comments at this time. We would refer you to any previous advice submitted at Regulation 14 stage, and for any further information to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood>

Attachments:

Response



Historic England

By e-mail to:
Caroline Hunt
Planning Policy Manager
South Cambridgeshire District Council

Our ref: PL00097803
Your ref:
Date: 14/03/2019

Direct Dial: [REDACTED]
Mobile: [REDACTED]

Dear Ms Hunt,

Ref: Cottenham Neighbourhood Plan Regulation 16 Consultation

Thank you for your correspondence dated 11 February 2019 inviting Historic England to comment on the Regulation 16 Submission version of the Cottenham Neighbourhood Plan.

We welcome the production of this neighbourhood plan, and are pleased to note that the historic environment of the parish is referred to throughout as well as specifically in Section 4. Aside from congratulating those involved however, we do not wish to provide detailed comments at this time. We would refer you to any previous advice submitted at Regulation 14 stage, and for any further information to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed NP, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

[REDACTED]
Edward James
Historic Places Advisor, East of England
[REDACTED]



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Cottenham Neighbourhood Plan - submission consultation

O - 67645 - 28499 - Chapter 4 Conserving the village character - None

67645 Object

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: Cambridgeshire County Council (Mr Colum Fitzsimons) [28499]

Agent: N/A

Full Text:

Summary: Policy COH/1-7: Local Green Space

Seeking an amendment to Policy COH/1-7 and COH/2-1 to facilitate the provision of primary education facilities in the village.

Attachments:

Plan
Representation

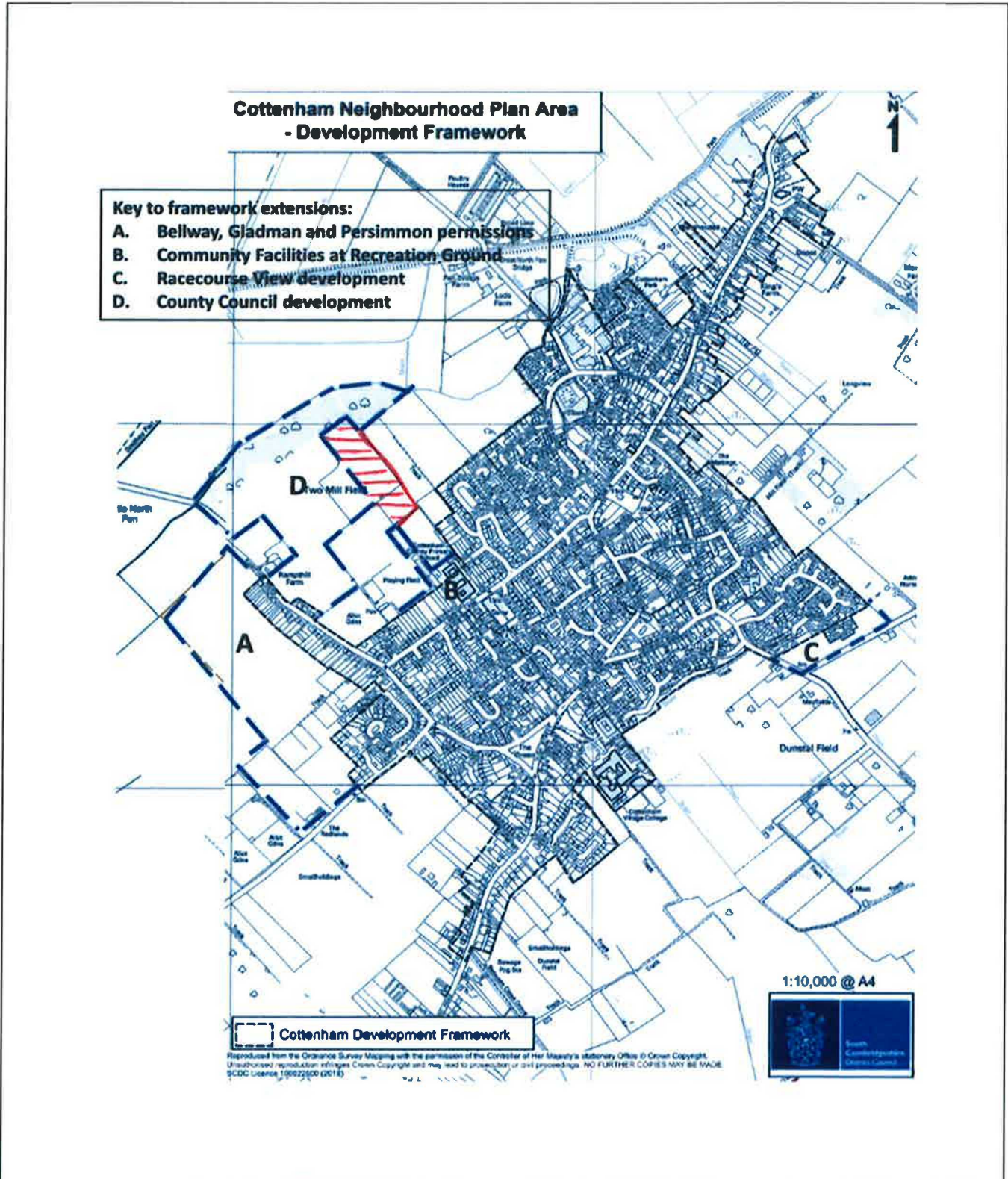


Figure 15: Cottenham’s Development Framework

Cottenham Neighbourhood Plan (Submission Plan): Representation by Cambridgeshire County Council

Policy COH/1-7 proposes an amendment to the Local Green Space designation at King George V Playing Fields to support the provision of community facilities. Policy COH/2-1 and Figure 15 extend the Development Framework boundary to include the land to the north of the Sports and Social Club buildings. This is described as “B” on the Figure 15. The County Council supports this as it will enable the expansion of the community facilities at this location.

Part of the wider strategy for housing development in the village is to ensure that primary school facilities can be created to meet the increased demand as a consequence of this new development. The County Council intends to meet this demand by expanding primary provision on the land immediately to the northwest of the existing playing fields at Cottenham Primary School. This strategy was evident in the consideration of the planning applications in this part of the village and most recently the application by Cambridgeshire County Council which identifies the land for primary school expansion and makes provision for access to it through the permitted development site.

This land is currently identified in the South Cambridgeshire Local Plan (Policy NH12-021) as Local Green Space and lies outside the Development Framework boundary. The effect of this will limit the ability for the County Council to deliver the enhanced primary education for the village. The County Council considers that Policy COH/1-7 should be amended as follows:

Policy COH/1-7: Local Green Space

In addition to the sites designated as Local Green Space in the Local Plan, this plan:

- a) alters the designated LGS boundary of the Recreation Ground (NH/12-21), including King George V Playing Field and the Primary School Expansion Land, as shown in figure 12, to:**
 - i. provide for Community Facilities and Primary Education Facilities described elsewhere in this plan and for which the need has increased as a result of development identified in this plan, and**
 - ii. improve the overall configuration of sports space**
- b) adds part of Les King Wood (figure 12) as designated Local Green Space where development will not be allowed except in very special circumstances; the connectivity and importance of this woodland to the community has increased as a result of development identified in this plan**

A further amendment to Policy COH/2-1 should also be made to the Development Framework boundary to include the primary school expansion land for the same reason that the boundary change at “B” facilitates other the provision of community facilities.

Policy COH/2-1: Development framework

The development framework for Cottenham should be extended (as shown in figure 15) to identify where development necessary to meet Cottenham’s assessed housing need and primary education requirements directly arising from this development should be permitted.

Land outside this boundary will be considered as rural and planning applications will be subject to countryside policies unless specific policies apply as set out in this plan or the Local Plan.

Figure 15 should also be changed to include the primary school expansion land as indicated on the attached plan.

Seeking an amendment to Policy COH/1-7 and COH/2-1 to facilitate the provision of primary education facilities in the village.

Cottenham Neighbourhood Plan - submission consultation

O - 67648 - 28710 - Chapter 4 Conserving the village character - None

67648 Object

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: Southern & Regional Developments (Mr Andrew Dutton) [28710]

Agent: Claremont Planning Consultancy (Katherine Else) [28712]

Full Text:

Summary: Policy COH/1-1: Landscape character

The weight granted to the preservation of landscape setting is inappropriate. Note context of the appeal site decision at Rampton Road.

Attachments:

Response form

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)

Policy C0H/1-1

Do you Support, Object or have Comments?
(Please tick)

- SUPPORT**
- OBJECT**
- COMMENT**

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.

A key theme of the emerging Neighbourhood Plan is the conservation of the fen-edge setting of Cottenham. This is a landscape which is sensitive to development given its flat topography, which can be particularly impacted on by visual intrusion into "big sky" views, through the large and far reaching views the landscape affords. Policy C0H/1-1 Landscape character promotes the preservation of the character of Cottenham by protecting vistas and views from various locations within the village and on its settlement edge. Clarendon Planning appreciates the motive of this policy to ensure that the fen-edge, rural setting of the village is not detrimentally altered by development, however it is advanced that this policy, where applied in various circumstances, may attribute inappropriate weight in protecting this landscape character. This was demonstrated in the allowed appeal at Cambridge County Council's site off Rampton Road, where the Inspector found that the impact on the local landscape, as a main reason for the application's refusal, was accredited undue weight in the planning balance. Therefore, it was deemed that the impact of development was less than substantial and therefore acceptable within the context of the proposed scheme (Appeal reference 3187048). This landscape analysis should be taken into account in the emerging Neighbourhood Plan, with greater emphasis applied to proposals at the settlement edge to include landscape buffers to allow for appropriate landscape impact mitigation

The promotion sites at Broad Lane are within the control of Southern and Regional. These sites fall outside the development framework of the village and towards the Cottenham Lode, however their development can provide for a new landscaped northern boundary to the village. By taking advantage of the presence of the Lode to the north and the comprehensive open space/woodland buffer associated with the County Council development site to the south and west, delivery of the promotion sites will be established using existing field boundaries as identifiable and defensible limits to the settlement. This will ensure the long-term preservation of far reaching views towards the north in the direction of the Great North Fen, but also soften the impact of any development in the north of the village through a landscaped edge.

Summary of Comments:

If your comments are longer than 100 words, please summarise the main issues raised.

The weight granted to the preservation of landscape setting is inappropriate. Note context of the appeal site decision at Rampton Road.

COMPLETED FORMS MUST BE RECEIVED BY 5PM ON 25 MARCH 2019 AT:

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

EMAIL: neighbourhood.planning@scambs.gov.uk

Cottenham Neighbourhood Plan - submission consultation

O - 67656 - 23632 - Chapter 4 Conserving the village character - None

67656 Object

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: Gladman Developments (Mr John Fleming) [23632] **Agent:** N/A

Full Text:

Summary: Policy COH/1-1 Landscape Character

Development can often be delivered without loss of openness, landscape character or views considered important to local community. Use of appropriate design to take into consideration wider landscape features of surrounding area.

Concern policy has protectionist stance - how will decision makers apply policy in consistent manner? Opinions on landscape are highly subjective - need further clarity about how these views are considered special to local community. Lead to inconsistency in decision making process. View needs some form of physical attribute to take it out of the ordinary rather than protecting open countryside for its own sake.

Need to modify policy - over restrictive. Contrary to basic conditions.

Attachments:

Representation
Response form

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)

- SUPPORT**
- OBJECT**
- COMMENT**

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.

Please see attached representations.

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 25 MARCH 2019 AT:

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

EMAIL: neighbourhood.planning@scambs.gov.uk

Cottenham Neighbourhood Development Plan

Regulation 16 Consultation

Submission Version



March 2019

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1 INTRODUCTION

1.1 Context

1.1.1 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for the planning system to deliver the homes, jobs and thriving local places that the country needs.

1.1.2 These representations provide Gladman's response to the current consultation on the submission version of the Cottenham Neighbourhood Plan (CNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.

1.1.3 Through these representations, Gladman provides an analysis of the CNP and the policy decisions promoted within the draft Plan. Comments made by Gladman through these representations are provided in consideration of the CNP's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG¹.

1.1.4 These representations will focus on the following matters:

- Legal compliance;
- National Planning Policy and Guidance; and
- Neighbourhood plan policies

¹ Section ID: 41

2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that the CNP must meet are 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) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;
- c) Having regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
- d) The making of the neighbourhood plan contributes to the achievement of sustainable development;
- e) The making of the neighbourhood plan is in general conformity with the strategic policies contained within the development plan for the area of the authority; and
- f) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.
- g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

2.2 National Planning Policy Framework, & Planning Practice Guidance

National Planning Policy Framework

2.2.1 The new version of the NPPF was published on 24th July 2018, given the transitional arrangements set out at paragraph 214 of the Revised Framework it is on the basis of the previous NPPF (2012 version) that these representations have been drafted.

2.2.1 The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it provides guidance on the requirement for the preparation of neighbourhood plans to be in general conformity with the strategic priorities for the wider area and defines the role which neighbourhood plans can play in delivering sustainable development.

2.2.2 At the heart of the Framework, is a "*presumption in favour of sustainable development*" which, as outlined in paragraph 11, should be seen as a golden thread running through both plan-making and decision taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet Objectively Assessed Needs (OAN) for housing, with sufficient flexibility to adapt to rapid change. This requirement is also applicable to neighbourhood plans.

2.2.3 Paragraph 16 of the Framework makes clear that the presumption in favour has implications for how communities engage in neighbourhood planning, stating that neighbourhoods should;

- "Develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;
- Plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and
- Identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed."

2.2.4 Furthermore, paragraph 17 sets out that neighbourhood plans should define a succinct and positive vision for the future of the area and that neighbourhood plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. In addition, neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

2.2.5 Further guidance for groups involved with the production of neighbourhood plans is specified at paragraph 184;

"Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not

promote less development than set out in the Local Plan or undermine its strategic policies.”

Planning Practice Guidance

2.2.6 It is clear from the requirements in the Framework that neighbourhood plan policies should be prepared in general conformity with the strategic requirements for the wider area, as confirmed in an adopted Development Plan. The requirements set out in the Framework are also supplemented by the Government’s suite of Planning Practice Guidance (PPG). In relation to the preparation of the CNP, the PPG on Neighbourhood Planning is of particular relevance.

2.2.7 The PPG also emphasises that;

“...blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”

2.2.8 With further emphasis that;

“... All settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”²

² Paragraph: 044 Reference ID: 41-044-20160519 (Revised 19/05/2016).

3 DEVELOPMENT PLAN

3.1 Adopted Development Plan

- 3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.
- 3.1.2 The adopted development plan relevant to the preparation to the CNP area, and the development plan which the CNP will be tested against is the South Cambridgeshire Local Plan (SCLP). This document was adopted in September 2018 and sets out the vision, objectives and overarching spatial strategy to guide development in South Cambridgeshire to 2031.
- 3.1.3 Policy S/8 'Rural Centres' is of particular note as it identifies Cottenham as a Rural Centre, alongside other settlements including Cambourne. Part two of this policy removes the limit on development sites within Development Frameworks, provided adequate infrastructure is already provided.
- 3.1.4 It is important to note that Policy S/13 clearly states that the Council will undertake an early review of the Local Plan which is expected to commence before the end of 2019 and with submission to the Secretary of State for examination anticipated by the end of Summer 2022. The Council is currently in the early stages of the Local Plan Review and are currently holding a Call for Sites consultation which ends 25th March 2019. The Local Plan Review is a joint plan being prepared with Cambridge City, for the Greater Cambridge area.
- 3.1.5 Given that the Local Plan is subject to an immediate review to consider an updated position on housing need, it is important that policies in the CNP allow for flexibility so that they are able to respond positively to changes in circumstance which might arise over the plan period. This degree of flexibility is required to ensure that the CNP is capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which states that:

'if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).'

4 COTTENHAM NEIGHBOURHOOD PLAN POLICIES

4.1 Context

4.1.1 These representations are made in response to the current consultation on the submission version of the CNP, under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This chapter of the representation highlights the key points that Gladman raise with regard to the content of the CNP as currently proposed.

4.2 Quantifying Housing Needs

4.2.1 Gladman support the Parish Council in commissioning AECOM as external consultants to undertake an assessment of the unconstrained housing need for Cottenham. The AECOM assessment considers 5 scenarios, discounts two of these and calculates an average from the remaining 3 scenarios. One of the scenarios discounted is the Proposed Submission Local Plan (PSLP). The Parish Council then 'correct' the AECOM scenarios to take account local constraints recognised in the Local Plan to provide 'a more realistic constrained number'. It is confusing how the Parish Council has arrived at the conclusion that the *"total practical local housing requirement arising from Cottenham NPA of 352 dwellings to 2031 if the PSLP is not adopted at the time the Cottenham NP is examined; otherwise the requirement is technically zero"*³ when the evidence provided by AECOM identifies an unconstrained housing need figure up to 716 dwellings over the plan period.

4.2.2 Whilst the adopted Local Plan may not specifically allocate any sites for housing in Cottenham and whilst its assumed 'fair share' of housing need may be in excess of existing commitments, housing needs will need to be looked at in the context of the Local Plan which elevates Cottenham from a Minor Rural Centre to a Rural Centre. Indeed, paragraph 2.44 of the adopted Local Plan specifically states *"the most sustainable categories of village for development in the context of South Cambridgeshire are Rural Centres and Minor Rural Centres for the purposes of making allocations for new housing."* It then states at paragraph 2.55 *"Rural Centres are the largest, most sustainable villages of the district. They have good access to a secondary school (either within the village or accessible by good public transport), employment opportunities, a variety of services and facilities and have good public transport services to Cambridge or a market town."* The Council clearly recognise the sustainability credentials of Cottenham and the Parish Council should not be seeking to restrict the level of growth to this settlement. The CNP should take a positive approach to growth in this sustainable location.

³ Neighbourhood Plan Evidence Paper E1 – paragraph 1.2

4.3 Policy COH/1-1: Landscape Character

4.3.1 The above policy outlines that developments are required to conserve the landscape character of Cottenham by protecting vistas that contribute to the character of the local area. This policy then identifies a number of vistas and areas of publically accessible land that these may be viewed from. The policy then goes on to list a number of requirements which should be met where development is permitted. This list relates to things such as lighting, man-made features and non-continuous screens of hedgerows.

4.3.2 Gladman submit that development can often be delivered in areas without resulting in the loss of openness, landscape character or views considered to be important to the local community. In such circumstances development proposals can be appropriately designed to take into consideration the wider landscape features of the surrounding area.

4.3.3 Gladman raise concerns with regards to the above policy given its 'protectionist' stance and question how decision makers will apply this policy in a consistent manner through the development management process. Opinions on landscape are highly subjective, therefore without further clarity about how these views are considered special to the local community, this policy is likely to lead to inconsistencies in the decision-making process. In this regard, for areas to be considered valued, means that a view would need to have some form of physical attribute that will allow a decision maker to come to the view as to whether these particular locations contain physical attributes that would 'take it out of the ordinary' rather than seeking to protect views of the open countryside for their own sake.

4.3.4 Gladman recommend that this policy is modified so that it is not overly restrictive and that it allows for sustainable development opportunities to be brought forward. As such, this policy is not in accordance with basic condition (a) and (d).

4.4 Policy COH/1-2: Heritage Assets

4.4.1 Gladman do not consider the second element of the policy which seeks to require development proposals to go 'over and above protection in the NPPF and the SCLP' is appropriate. This approach is not in accordance with the requirements of the Framework and instead this policy should be modified so that development proposals are considered in accordance with the requirements of national/local policy and guidance. As such, this policy is not in accordance with basic condition (a).

4.5 Policy COH/1-5: Village Character – New Build

4.5.1 The above policy outlines that planning applications will be required to enrich the character of the settlement, by wherever practical, meeting the identified criteria.

4.5.2 Whilst Gladman support the use of the term 'wherever practical' as this adds an element of flexibility within the policy wording, it is essential that the criteria listed is not too prescriptive were it would result in hindering the deliverability of a development opportunity. Gladman is concerned with a range of matters included in this policy as follows:

- Part b) requires that new build development to avoid groups of 3 or more near identical houses. Gladman consider that this element of the policy is too prescriptive and should be removed.
- Part f) Requires car parking to be at the side rather than the front of properties. It is unclear why this policy requirement is being pursued as it is not supported by any evidence. This element of the policy is considered too prescriptive as it will not allow the most appropriate layout of schemes.
- Part i) requires development to provide up-to-date communications infrastructure to facilitate home working and reduce car dependency. Whilst this is an admirable aim, any such requirement should be seen as aspirational. Further clarity is also needed on how this infrastructure is expected to be delivered. In this regard, Gladman remind the Parish Council that the delivery of communications infrastructure is the responsibility of infrastructure providers in the telecommunications and broadband industry to secure connectivity of this nature. By setting a policy requirement this may have an unintended impact on housing delivery as the delivery of this infrastructure is outside the control of individual developers and is instead the sole responsibility of the infrastructure providers.

4.6 Policy COH/1-6: Village Character – the village core or centre

4.6.1 Gladman note that this policy requires development to include 'discrete electric charging points'. Gladman raise concerns over this requirement as it does not appear to be supported by robust evidence. Before any such policy is pursued, engagement with the main energy suppliers should have been undertaken in order to determine network capacity to accommodate any adverse impacts if a proportion of, or all development proposals would be required to have an electric charging facility. If charging demand became excessive there may be constraints to increasing the electric loading in the area because of the limited size and capacity of existing cables and new sub-station infrastructure may be necessary. The cost of such infrastructure may adversely impact the delivery of development proposals and thus have an impact on the delivery of sustainable development. It is therefore recommended that flexibility be built into the Plan to ensure that this policy does not result in an approach which is prescriptive and could result in rendering development unviable. Gladman therefore recommend the reference to electric charging facilities is deleted. As currently worded this policy is not supported by robust evidence and is therefore in conflict with basic conditions (a) and (d).

4.7 Policy COH/2-1: Development Framework

4.7.1 The above policy outlines that land outside of the Development Framework will be considered as countryside and that planning applications will be subject to countryside policies unless specific policies apply as set out in the CNP or the Local Plan.

4.7.2 Gladman object to the use of 'countryside' policies which seek to protect the countryside for the sake of its intrinsic character. Such an approach would appear to be based on the old PPS7 approach to countryside protection, which took a restrictive stance to development in rural areas and only permitted certain types of development. The Framework is clear that development which is sustainable should go ahead without delay in accordance with the presumption in favour of sustainable development. In reality, the use of development limits or frameworks such as this creates a 'presumption against development' in all areas beyond an arbitrary line which will act to confine the physical growth of the settlement and would not be in accordance with the requirements of national policy and therefore in conflict with basic conditions (a) and (d).

4.7.3 Accordingly, Gladman consider that the above policy should be modified to allow for flexibility and it is considered that the CNP would be better served by a criteria based approach consistent with the requirements of national policy and the following wording is put forward for consideration:

"The neighbourhood plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

Development proposals that are considered sustainable and well related to the existing settlement will be supported provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development."

4.8 Policy COH/2-2: Large Site Design

4.8.1 Gladman welcome the use of the term 'wherever practicable' within the policy wording as this provides a degree of flexibility as not all sites will be capable of meeting all the specific requirements outlined under this policy. Notwithstanding this, Gladman are concerned that a number of these requirements are ambiguous and subjective, for example applying imaginative and original design. These types of design policies should be seen more as guidance rather than actual policy. In addition, Gladman also query part b) of the policy which requires schemes apply landscape design criteria in the layout, form and urban design qualities of each site. It is unclear exactly what this criteria would require and further detail should be included within the policy itself or its supporting text.

4.9 Policy COH/2-3: Use of Brownfield Sites for Housing

4.9.1 Although the principle of the policy is supported which seeks to allocate three sites to deliver 15 1-2 bedroom apartments this is on the provision that sufficient business and retail space is retained in any overall scheme.

4.9.2 Despite the concerns raised in our previous representations, it does not appear that the Parish Council has provided certainty that these allocations are available for development. Without this detailed level of understanding regarding the deliverability of these sites, they are merely aspirations which should be included as an appendix to the Plan which contains other non-land use policies.

4.10 Policy COH/2-4: Locally Affordable Housing and CLT

4.10.1 The above policy outlines that planning permission will be granted for development of around 90 dwellings on greenfield rural exception sites over the plan period provided that such opportunities are in accordance with the requirements listed under the policy.

4.10.2 Whilst recognising the importance of delivering housing to meet identified housing needs, rural exception sites can be difficult to deliver if they are to provide 100% affordable housing as it is unlikely that a landowner or development would be willing to promote such a scheme as it is highly doubtful that it will be viable and achieve the most optimum value of land that could be secured. Gladman recommend that in order to secure affordable housing needs in full consideration should be given to additional housing allocations to provide a mix of market and affordable homes to meet affordable housing needs in full.

4.11 Village Facilities

4.11.1 Policies COH/4.1.1 – COH/5.1 suggests that planning permission will be approved for facilities including a nurse, doctor's surgery, recreational facilities a village hall etc.

4.11.2 In this regard, it is important for the Parish Council to carefully consider ways in which it will fund the deficit for the provision of these facilities and other community aspirations identified in the Plan. Gladman consider that the allocation of additional housing land could help secure the delivery of these objectives and the Plan's aspirations to meet its affordable housing needs through financial contributions provided through s106 Agreements or Unilateral Undertakings.

5 CONCLUSIONS

- 5.1.1 Gladman recognises the Government's ongoing commitment to neighbourhood planning and the role that such Plans have as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the CNP must be consistent with national planning policy and guidance. If the plan is found not to meet the Basic Conditions at Examination, then the plan will be unable to progress to referendum.
- 5.1.2 For the reasons outlined within this response Gladman consider that the Plan as currently proposed is inconsistent with Basic Conditions (a) and (d). Gladman recommend that the Plan is modified so that it allows for additional flexibility and would not result in preventing sustainable growth opportunities from coming forward or the ability of residents from outside of the parish accessing affordable housing.
- 5.1.3 Should the Examiner consider it necessary to hold a public examination then Gladman respectfully request that we are afforded the opportunity to participate at the hearing session(s) to discuss the issues raised.