

Pampisford Parish Council

Neighbourhood Plan examination

November 2024

This document contains:

- I - Response to Examiner's points for clarification
- II – Response to SCDC representation
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- IV – Response to Cheveley Park Farms representation

I - Response to Examiner's points for clarification

PAM	Examiner point	PC Response
1	Does the reference to homes built to Building Regulations Part M4 (2) mean that all the houses should be constructed to this standard?	That is correct. Application of the M4(2) standard to all new homes is in line with recommendation 47 of the Cambridgeshire and West Suffolk Housing Needs Specific Groups study (2021), as stated in paragraph 6.1.13 of the NP. However, we recognise that the policy needs to be applied with regard to the cost implications, i.e. <i>unless it can be demonstrated in a full financial appraisal that the application of the standard would make the development unviable</i> . See also our response to SCDC on PAM 1.
1	It would be helpful if the Parish Council comments on the intended purpose of the final part of the policy. As submitted, it does not have regard to national policy (NPPF paragraph 65)	<p>This refers to: <i>Larger residential development schemes coming forward under the very exceptional circumstances set out in Policy S/11 of South Cambridgeshire's Local Plan (more than 2 and up to 8 dwellings on brownfield sites) will only be supported where the identified positive overall benefit to the village includes the delivery of affordable homes that meet the needs of local people whose needs are not met by the market and smaller homes that will help to address the low stock of one and two-bedroom homes in the parish.</i></p> <p>The basic conditions require the Neighbourhood Plan to be appropriate, having regard to national policies and advice contained in guidance issued by the Secretary of State.</p> <p>The basic conditions also require the Neighbourhood Plan to be in general conformity with strategic policies in the Local Plan. Policy S/11 is such a strategic policy. This identifies Pampisford as an 'infill village' where development would normally be restricted to sizes of not</p>

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		<p>more than 2 dwellings. The supporting text to Policy S/11 explains “Development on any scale would be unsustainable in these villages, as it will generate a disproportionate number of additional journeys outside the village. Development will not be permitted on sites capable of accommodating scheme sizes significantly larger than 2 or exceptionally 8 dwellings in Infill Villages.”</p> <p>It should also be noted that Clause 3 in Policy S/11 in the Local Plan does not explicitly state that the exceptional circumstances can only apply inside development frameworks.</p> <p>Given the lack of infrastructure available to support residential development in Pampisford village, it stands to reason that any schemes being brought forward on an exceptional basis and on the basis that overall benefits will be brought to the village, those homes being delivered should be capable of meeting an existing need in the village, such as affordable homes for those whose needs are not met by the market or smaller homes to help address the low stock in the parish.</p> <p>Furthermore:</p> <ul style="list-style-type: none"> • this clause was incorporated into the policy following the Regulation 14 consultation, specifically in response to a representation made by the local planning authority. See pages 2 and 3 in Appendix 8 to the Consultation Statement. • the adopted West Wickham Neighbourhood Plan includes a similarly worded policy that was found to meet the basic conditions, under the July 2021 NPPF (same paragraph applied) <p>In light of the examiner question and in light of the above, the following amendments are proposed to the final clause of the policy:</p> <p><i>Larger residential development schemes coming forward under the very exceptional circumstances set out in Policy S/11 of South Cambridgeshire’s Local Plan (more than 2 and up to 8 dwellings on brownfield sites) will only be supported where the identified positive overall benefit to the</i></p>

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		<p><i>village includes the delivery of affordable homes that will help meet identified needs within Pampisford parish, including smaller homes (helping to address the low stock of one and two-bedroom homes) suitable for older people looking to downsize and younger people and families looking for their first home. Schemes that deliver affordable homes to meet the needs of local people whose needs are not met by the market will also be supported. and smaller homes that will help to address the low stock of one and two-bedroom homes in the parish.</i></p> <p>For avoidance of doubt, the edited clause would read:</p> <p><i>Larger residential development schemes coming forward under the very exceptional circumstances set out in Policy S/11 of South Cambridgeshire’s Local Plan (more than 2 and up to 8 dwellings on brownfield sites) will only be supported where the identified positive overall benefit to the village includes the delivery of homes that will help meet identified needs within Pampisford parish, including smaller homes (helping to address the low stock of one and two-bedroom homes) suitable for older people looking to downsize and younger people and families looking for their first home. Schemes that deliver affordable homes to meet the needs of local people whose needs are not met by the market will also be supported.</i></p>
2	Does the policy bring any added value beyond the details in local plan policies?	<p>Policy H/11 of South Cambridgeshire Local Plan 2018 (Chapter 7: Rural Exception Site Affordable Housing) states:</p> <p><i>1. Affordable housing developments to meet identified local housing needs on small sites adjoining a development framework boundary will be permitted subject to:</i></p> <ul style="list-style-type: none"> <i>a. The number, size, design, mix and tenure of affordable homes are confined to, and appropriate to, meeting identified local needs;</i> <i>b. The development is of a scale and location appropriate to the size, facilities and character of the settlement;</i> <i>c. For sites at settlements within or adjoining the Green Belt, that no alternative sites exist that would have less impact on Green Belt purposes;</i> <i>d. That the affordable homes are secured for occupation by those in housing need in perpetuity. Mortgagee in Possession clauses will be allowed where demonstrated to be necessary to enable development to proceed.</i>

PAM	Examiner point	PC Response
		<p>In the NP Policy PAM 2 we wished to define more exactly the aspects of character (criterion b) that are important to the village, and also complement the existing criteria with an additional one to help address the paucity of housing options available for people with a strong local connection to Pampisford. See paragraphs 3.14 (housing survey), 4.17 (key issues), Table 2 (SWOT analysis). Policy PAM 2 also requires that any First Homes being delivered as exception sites should be offered to householders with a local connection on a preferential basis.</p> <p>To conclude, Policy PAM 2 has an important role in articulating the parish level priority that is attached to delivering affordable homes that can address parish-level needs. It also applies a distinct local approach to that set out in the strategic policy.</p>
3	Should the second part of the policy be applied proportionately to acknowledge that not all development proposals will have an impact on any, some or all of the criteria?	<p>By “second part of the policy” we understand the part that starts with “To be supported development proposals must: ...”.</p> <p>We accept that the criteria may not be applicable to all schemes, and this will depend on the location and nature of a scheme and to some extent scale. With respect to scale however, small scale development that is insensitive in landscape terms to its surroundings can have a harmful impact. The clause could reasonably be amended to state “As appropriate to their scale and/or nature and location, development proposals must...”</p>
3	The proportionate element issue also applies to the final part of the policy. In addition, what is meant by a ‘generous and comprehensive’ landscape buffer?	Any development abutting the development framework will impact on the transition from built form to the surrounding landscape to a larger or lesser degree. The policy will therefore always be applicable. The description of the buffer needing to be “generous and comprehensive” dissuades any tokenistic application. It implies a landscaping which as far as possible avoids creating any abrupt edges and softening ones that may already exist.
4	As the District Council comments, the policy does not refer to the type or scale of	The wording of the policy aims to be comprehensive in its application, i.e. relevant to any development within this tightly defined area, whether new buildings or – as stated – redevelopment of existing buildings, whether commercial or domestic. The existence of relatively large, commercial

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	<p>development where contributions will be sought. In this context the policy might not be suitable for all types and scales of development. What types of development does the Parish Council anticipate would be affected by this policy?</p>	<p>landholdings, with significant frontage onto London Road, nevertheless represent the most important opportunity to improve the street scene when such areas are developed in the future. That is why we particularly highlight landscaping improvements and traffic calming measures, more appropriate to bigger schemes.</p> <p>The first part of the policy is intended to apply to development proposals where opportunities arise as part of that scheme to undertake landscape improvements.</p> <p>The last clause of the policy specifies when these improvements or contributions towards these improvements will be required. The wording is written so the clause is appropriate having regard to paragraph 57 of the NPPF 2023 (necessary to make the development acceptable, directly related to the development and fairly and reasonably related in scale and kind to the development). This is unlikely to apply to development proposals that are smaller than major development as defined in NPPF (e.g. 10 or more homes, and for non-residential additional floorspace of 1,000 sq m or more).</p>
5	<p>The policy simply lists the proposed Local Green Spaces and does not set out any policy guidance. I am minded to include the matter-of-fact approach used in NPPF107 at the end of the policy. Does the Parish Council have any comments on this proposition?</p>	<p>In paragraph 6.5.1 (policy context) it is noted that a Local Green Space, once designated, <i>is safeguarded as an open space and protected from development.</i></p> <p>So long as it doesn't affect the lawfulness of the policy and so long as this change is required for the basic conditions to be met we would be supportive of adding wording consistent with NPPF 107: <i>Policies for managing development within a Local Green Space should be consistent with those for Green Belts.</i></p>
6	<p>This is an excellent policy which is underpinned by the details in the Design Code. In the round it is a very</p>	<p>Noted, thanks for the feedback.</p>

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	good local response to Section 12 of the NPPF.	
8	I looked carefully at the site of the former Chequers PH during the visit. The policy is both positive and non-prescriptive. It also reflects the sensitive location of the site.	Noted, thanks for the feedback.
8	The final element of the policy reads slightly out of context. As such, I am minded to reposition it into the supporting text. Does the Parish Council have any comments on this proposition?	<p>As you can appreciate, the loss of the Chequers Pub was a significant blow to the community and in the years following the fire there have been concerted efforts to find a means of restoring the site to a new public house and community meeting point. The wording of the policy has been revised a number of times during the course of this process, reflecting the narrowing window of opportunity towards this end, and the realisation that a more flexible approach to the future use of the site is needed.</p> <p>For the above reasons it is important to the PC to keep the text as part of the policy, rather than repositioning it. The first part of the policy clarifies what would be required as part of the redevelopment scheme, and the second part of the policy is providing a strong message with respect to what the community really wishes to see delivered on this site. To separate these two parts out would fail to reflect the reasoning that has gone into crafting this policy. The Parish Council does not consider the basic conditions require the final element of the policy to be repositioned into the supporting text; in fact to do so would undermine the community and stakeholder engagement work that has been put into this.</p> <p>If necessary for the policy to meet the basic conditions, the wording could be improved to the following to link better with the first part of the PAM:</p>

PAM	Examiner point	PC Response
		<i>Proposals of the following nature will be especially supported:</i>
9	In general terms the policy takes a positive and non-prescriptive approach to climate change issues and sustainability issues.	Noted, thanks for the feedback.
9	The final element of the policy describes a process rather than a land use policy. As such, I am minded to reposition it into the supporting text. Does the Parish Council have any comments on this proposition?	<p>If this detail is relocated to supporting text, its relevance to the development management process will be weakened and this will increase the likelihood of flood risk from surface and groundwater flooding in particular being overlooked. It is particularly in light of the fact that officers only secure support from the lead local flood authorities when certain thresholds are met.</p> <p>This clause was added to the policy in response to a number of comments from the LLFA with respect to giving full recognition to surface water flood risk in the parish.</p>
10	The thrust of the policy is very appropriate. Nevertheless, does the policy bring any added value beyond national policy (including the Building Regulations) and the details in local plan policies?	<p>This policy and its supporting text was carefully reviewed following the Regulation 14 consultation and in response to a similar comment made by the local planning authority. The first bullet point is included to address Pampisford specific issues as described in supporting paragraph 6.10.7. The third bullet point refers directly to design codes 3.2.1 and 3.2.7, prepared for Pampisford Parish by AECOM via the Design Codes document. The second paragraph expects design to allow for home working – this is in response to the levels of home working in the parish, as set out in paragraph 6.10.2.</p> <p>The final paragraph in Policy PAM 10 is also specific to Pampisford Parish. It is supported by paragraph 6.10.6 and Map 10. Without this element of Policy PAM 10 that works together with the supporting information (including information on existing user safety issues along the network), this parish level policy ‘hook’ for considering the importance of Pampisford’s existing network of active travel</p>

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		routes and identifying opportunities for improvements in Pampisford will be completely lost. This element of PAM 10 will directly help with implementation of strategic policy TI/2 'Planning for Sustainable Travel' at the parish level.
11	The Parish Council's comment on the District Council's representation on this policy would be very helpful (see the request later in this Note).	Please see our response to the SCDC comment.
12	The second part of the policy largely restates national policy. In this context, could the local delivery element of this part of the policy be weaved into the third part (as submitted)?	This is a reasonable suggestion. However, we do not see any significant fault with the current formulation of the policy which is logical in how it: <ul style="list-style-type: none"> (1) Sets out the general principle of the mitigation hierarchy (2) Summarises the national BNG framework (3) Details how we wish to see this applied in our parish.
13	The thrust of the policy is very appropriate. Nevertheless, does the policy bring any added value beyond national policy (including Section 9 of the NPPF) and the details in local plan policies?	Given the high levels of concern about parking and traffic volume and speed, evidenced in our engagement activities within the Parish (see paragraphs 4.10-4.12), it is important to the Parish Council to have a strong policy in this area contained within our Plan. The policy adds specific detail that, inevitably, is not contained in existing strategic and national policies, for example mentioning key areas within the village (e.g. London Road, Brewery Road, site of the former Chequers Pub) where the policy should be targeted. This distinctive layer of detail at the parish level will ensure strategic policies existing at the Local Plan level and at the national level can be reliably applied at the local level.
14	The thrust of the policy is very appropriate. Nevertheless, does	Our response is similar to above (on PAM 13): in this case that the Parish Council requires the plan to have a strong policy given the unusual amount of business activity in the village and the close proximity of the business/employment

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	the policy bring any added value beyond national policy (including Sections 6 and 8 of the NPPF) and the details in local plan policies?	areas to residential areas (see paragraph 6.14.8). The types of pollution mentioned in this policy have all been experienced within the village and in some cases still are. The neighbourhood plan provides an additional level of detail that is required so that policies at the Local Plan and national level can be reliably applied at the local level.
15	Should this policy be applied proportionately to the scale and nature of the proposed development?	Yes, the policy should be applied proportionately depending on the scale and nature. We believe the wording used (“opportunities should be taken”) allows for that.
16	As its wording suggests does the policy bring any added value beyond the details of Policy PAM4?	There is overlap between PAM 4 and PAM 16. However, PAM 4 relates to the theme of Village and Parish Character, whereas PAM 16 relates to Local Economy. The strategic nature of the London Road employment area needs addressing in both respects. As stated in paragraph 6.16.2: <i>The Policy PAM 4 identifies opportunities for improvements along London Road. Policy PAM 16 seeks to ensure such opportunities are taken when applicable development proposals in the London Road employment area come forward.</i>
17	The Parish Council’s comments on the District Council’s representation on this policy would be very helpful (see the request later in this Note)	Please see our response to the SCDC comment.

II - Response to South Cambridgeshire District Council representation

PAM (Para)	SCDC comment	Parish Council response
1(6-8)	<p>We consider that the first part of Policy PAM1 is not clear in terms of the delivery of homes in accordance with Part M4 (2) of the Building Regulations. SCDC Local Plan Policy H/9 (Housing Mix) asks for 5% of homes on sites of 20 dwellings or more to be built to the accessible and adaptable M4(2) standard.</p> <p>The opening sentence of the policy states that “Infill residential development within the development framework will be supported in line with Local Plan policy...” but the second bullet point states that this means “building homes to the Building Regulations accessible and adaptable dwellings M4 (2) standard unless it can be demonstrated in a full financial appraisal that the application of the standard would make the development unviable.”</p> <p>It is unclear from the wording of the bullet point whether all new homes should be built to M4 (2) standard. If this is the case, then it would exceed rather than be “in line with” the Local Plan policy.</p>	<p>As stated in supporting text paragraph 6.1.11, Policy PAM 1 is intended to be applicable to all new homes. This reflects what the Parish Council deems to be needed given the ageing population of the parish and to ensure their suitability for disabled people. As described in the introduction to Goal 1 (Improve the suitability of our housing so that it meets the need of existing and future residents), our policy is in accordance with NPPF 2023 paragraph 63. Furthermore, as described in paragraph 6.1.13, it is consistent with recommendation 47 of the Cambridgeshire and West Suffolk Housing Needs Specific Groups study (2021) which states: <i>Where possible all new homes should be M4(2) compliant to ensure homes are future proofed.</i></p>
1(9)	<p>In relation to achieving homes built to M4 (3) standard, it seems that this is an aspiration rather than a requirement of an infill plot development given the opening “will be supported” statement? As such, proposals that otherwise meet the requirement of Policy PAM1 could not be refused if they were not built to M4 (3) standard.</p>	<p>This is a correct interpretation.</p>
1(10)	<p>In the final paragraph we note that proposals that meet the very exceptional circumstances of Local Plan Policy S/11 will only be supported where affordable housing is delivered as part of the proposal. Such an approach is contrary to paragraph 65 of the</p>	<p>This is addressed in our response to the examiner questions above.</p>

PAM (Para)	SCDC comment	Parish Council response
	NPPF (December 2023) which states “Provision of affordable housing should not be sought for residential developments that are not major developments,”	
2(11)	Our Pre-Submission response suggested that Policy PAM2 appeared quite similar to Policy H/11 (Rural Exception Site Affordable Housing) from the adopted South Cambridgeshire Local Plan (2018), so it could be removed unless it was demonstrated that there was a distinct difference that would apply to Pampisford. We continue to question whether Policy PAM2 is needed in addition to the adopted Local Plan policy.	We uphold our response to this comment at Pre-Submission: <i>Through PAM 2, the community is expressing in principle support for rural exception sites where it can help to address Pampisford specific needs and where development contributes positively existing character of the village. This is an important part of the plan given the affordability issues (see paragraph 6.2.2. of the NP) and NPPF policy that restricts the ability to require affordable housing on sites with less than 10 units.</i>
3(12)	There is a close relationship between this policy and Policy PAM11, and it is questioned whether the reference to trees is required here given the more thorough criteria of PAM11. In the case of this policy, inclusion of the wording ‘retain or enhance existing landscape features’ does not cover instances where trees have little amenity value and would potentially need to be removed to facilitate a development, such as instances where trees are of poor quality/ diseased and/or would have limited visual impact if removed. We suggest adding wording to give greater clarity to the policy. In addition, clarity on what a ‘generous and comprehensive landscape buffer’ is required, ensuring that it is being proportionate to the development and what scale of development this would apply to. For example, would this include householder (extensions)?	We agree that there is a relationship here, although the respective policies are aimed at different goals (village character/landscape and biodiversity protection), and trees are relevant to both. It is arguable that a tree with little amenity value, or which is diseased or of otherwise poor quality, represents “a feature of landscape value”, so we suggest that the current wording is appropriate. Regarding buffers, please see earlier response to the examiner’s same question.

PAM (Para)	SCDC comment	Parish Council response
3(13)	<p>In supporting text at paragraph 6.3.9 is a list of design code numbering and we recommend it would be beneficial to include wording to give more explanation from the design code as to what those sections says.</p>	<p>In the interests of conciseness in this section of the Plan, we believe that cross referencing the design code numbers to topics (landscape character, amenity space, trees, etc.) suffices. They are provided in Appendix One with fuller explanations provided in the Design Codes document.</p>
4(14)	<p>Our Pre-Submission response recommended that perhaps more photos would help illustrate the problems with the street scene. Other aspects of the street scenes to consider could be footway surface quality, widths of streets and footways, how well maintained they are, green verges, signage, barriers, less safe or less visible sections, and poor street lighting. Is it the case that the Brewery Road/London Road village gateway is satisfactory in terms of these other aspects as a point of contrast with the problems identified?</p> <p>We still consider that the Plan content on this matter is rather slight. We would expect more commentary and analysis to justify the policy, explaining what is so incoherent and unattractive about the area. Perhaps more photos would help illustrate the problems with the street scene or going into detail about different sections along the London Street / Brewery Road.</p> <p>Perhaps the policy context and rationale could consider other aspects of the street scenes e.g. footway surface quality, widths of streets and footways, how well maintained are they, green verges, too much signage and clutter, barriers / obstacles, less safe / less visible sections, lack of street trees or poor street lighting, although it must be acknowledged that some aspects of change to</p>	<p>This suggestion of including more photos was noted previously but not prioritized for action at the last revision. We are not convinced that photos of individual features, as suggested, would significantly help to explain the lack of coherence which can only be properly perceived in terms of the whole street scene. The Brewery Road/London Road Gateway, in being a junction, doesn't offer a very satisfactory comparison with the length of London Road that is the subject of this policy (see Map 8).</p> <p>The supporting text to Policy PAM 3 explains how there is scope to improve the appearance of both the Brewery Road/London Road village gateway (north) and the London Road village gateway south. These issues are illustrated with photographs. The supporting text to PAM 4 explains the additional issues with respect to the western side of the road between</p>

PAM (Para)	SCDC comment	Parish Council response
	the street scene do not require planning consent as if they are in the highway they are deemed as permitted development.	these two frontages. The policy itself is to the point with respect to what is being sought. We don't believe the proposed changes are needed to ensure the Plan meets the basic conditions.
4(15)	Our Pre-Submission response stated that Policy PAM4 does not refer to the type or scale of development where contributions are sought. The policy might not be suitable for all types and scales of development. We recommended that reference was made to the type or scale of development where contributions are sought within the Policy wording. We still consider that this clarity is required in the policy.	We noted this Pre-Submission comment but continue to believe that it is addressed by the last clause which states where 'fairly and reasonably related in scale and kind to the development'.
4(16)	Our Pre-Submission response stated Cambridgeshire County Council had concerns about the deliverability of this policy and to seek information about who owned the pathway and hedges next to the road. Was it the businesses or Cambridgeshire County Council? Then, depending on the owner, change the policy emphasis to ensure that the policy is strong enough to capture contributions efficiently. For example, if the County Council owns the hedges and pathway, then it would make sense to emphasise using contributions to improve the 'public realm' of that area. However, if the hedges and pathways are owned by the businesses, with little publicly owned land, then the policy needs to change to place the onus upon the businesses to improve the land next to the road as part of any future proposals. The neighbourhood plan group was encouraged to contact the County Council to find out about the extent of the adopted highway to see if the County Council owns all road and the land next to it.	As a result of the Pre-Submission comment we amended the policy so that it would work in both scenarios. A scenario where the developer owns the land where the improvements are to take place and a scenario where the area is not owned by the developer.

PAM (Para)	SCDC comment	Parish Council response
	We note that Policy PAM4 has been amended but we continue to recommend that in PAM4 policy wording is given further clarity to ensure any appropriate development may be required to deliver or make financial contributions, as currently the policy wording in the final paragraph is highlighting public realm alone.	
5(17)	Our Pre-Submission response recommends that if there are requests for public realm or play equipment improvements, these improvements should be inclusive for users and if they have guardians with them. We continue to recommend this approach.	This is noted.
5(18)	We recommend the additional wording to PAM5 policy after Local Green Space sites to include “Development proposals within the designated local green spaces will only be supported in very special circumstances.” to ensure it aligns with national policy requirements.	Please see our response to the examiner’s comment on this.
7(19)	Our Pre-Submission response recommended that policy PAM7 could also be refined to reflect adopted South Cambridgeshire Local Plan policy SC/8, e.g., allotments would be replaced by an area of equivalent or better quantity and quality and in a suitable location. We still consider this clarity should be provided in Policy PAM7.	Policy PAM 7 is intentionally written to reflect Pampisford-specific circumstances.
7(20)	We also suggest that for clarity, an additional sentence should be added to the supporting text to confirm that although the community would like to see further use of the village hall (which is included as a community action), it is considered that Policy SC/3 in the adopted Local Plan provides sufficient protection for this facility and therefore no specific policy for the village hall is included in the Neighbourhood Plan.	We agree. The second paragraph under “Goal 3” could be amended to read: The parish greatly values its existing community facilities. Consistent with national planning policy, Local Plan Policy SC/3: Protection of Village Services and Facilities and Local Plan Policy SC/8: Protection of Existing Recreation Areas,

PAM (Para)	SCDC comment	Parish Council response
		<p>Playing Fields and Community Orchards resist the loss of valued village services and open spaces. <u>These Local Plan policies would apply to the Village Hall, the Church and the Recreation Ground and the NP</u> supports this approach.</p>
10(21)	<p>Our Pre-Submission response stated that we felt that this policy replicated adopted South Cambridgeshire Local Plan policy. Cycle and electric parking are already covered by Policy TI/2 'Planning for Sustainable Travel' from South Cambridgeshire's Local Plan. Electric car parking is covered by policy TI/3 'Parking Provision' and policy TI/10 'Broadband' already covers broadband. It is also likely to be covered in the new Local Plan. PAM10 should be demonstrably different, and local in nature, compared to the Local Plan policies.</p>	<p>We noted this Pre-submission comment and made some appropriate amendments to the wording of the policy and the supporting text. A section of supporting text was added with respect to appropriate cycle parking in the parish and with respect to the existing routes (including issues) for non-motorised users in and around the parish. Together with the map this content provides parish specific context and policy that does not exist elsewhere.</p>
10(22)	<p>Our Pre-Submission response questioned how the requirement to incorporate a dedicated home office area could be monitored and enforced? We still have concerns regarding this, in particular how this will be delivered alongside PAM1 requirements for smaller units and be viable.</p>	<p>We earlier responded, and continue to assert, that this is about ensuring the layout of dwellings, in the first instance, is suitable for home working. It is not about monitoring how people use their homes once they are built.</p>
11(23)	<p>We suggest adding wording to add clarity to the policy as a tree survey to BS5837 will not identify ecological value, suggest wording 'will be expected to be accompanied by a professional arboricultural survey report undertaken to the appropriate</p>	<p>We agree with the proposed amendment: 'will be expected to be accompanied by a professional arboricultural survey report undertaken to the appropriate standards (to</p>

PAM (Para)	SCDC comment	Parish Council response
	standards (to BS5837) and a preliminary ecological survey identifying the arboricultural landscape and biodiversity value of the trees'. Additionally, we recommend that Biodiversity Net Gain wording, as statutory requirement it can be removed from the policy PAM11 wording.	BS5837) and a preliminary ecological survey identifying the arboricultural landscape and biodiversity value of the trees' and would like to make this.
11(24)	We recommend adding wording to point 2 of the policy, regarding financial contribution, to clarify to what trees; sizes and values, would the contribution apply.	This is understood to apply to point 3. This would vary case by case and would be informed by detail set out in the arboricultural survey report and ecological survey.
11(25)	We recommend the compensatory provision wording in section 3 of PAM 11, that the industry accepted calculation method would now be covered by BNG rather than CAVAT.	<p>This element of the policy was incorporated post Regulation 14 to address advice from the local planning authority.</p> <p>We now query whether this new advice is accurate. The requirement to compensate for loss or harm to trees that cannot be avoided or mitigated is separate to the BNG requirement although they could be interrelated depending on site specific circumstances. Furthermore, BNG legislation would not apply to all proposals that Policy PAM 11 would apply to.</p>
12(26)	The policy has two sets of Roman numerals which will make it difficult for those using the Plan to refer to. Would recommend that one of the sets becomes a) b) etc	There may only be marginal benefit to implementing this change. In general, the different points within all the PAMs are not numbered at all.
12(27)	We recommend that Biodiversity Net Gain wording, as statutory requirement, can be removed from the policy PAM12 wording.	We don't believe this change is needed to ensure the Plan meets the basic conditions.

PAM (Para)	SCDC comment	Parish Council response
13(28)	<p>Policy TI/3: Parking Provision of the adopted Local Plan states that car parking provision should be provided through a design-led approach in accordance with the indicative standards set out in Figure 11 of the Plan. We suggest that the second paragraph of the PAM13 should refer to the Parking Standards in the extant adopted local plan.</p> <p>The Highway Authority can only seek works that directly mitigate the impact of a development, so the use of ‘quiet tyre technology’ would fall outside our remit and would also require careful consideration in relationship to its life span and durability.” The visual impact of additional vehicle movements would also be difficult to measure and define. We suggest this is removed from PAM13 policy wording.</p>	<p>We agree the first line of the second paragraph could include a reference to car parking standards set out in the Local Plan.</p> <p>With regards the second paragraph in this response, the final clause is worded so that mitigation measures are related to the impact of a development. This part of the policy is appropriate and consistent with paragraph 10.18 in South Cambridgeshire’s 2018 Local Plan (supporting text to Local Plan Policy TI/2 ‘Planning for Sustainable Travel’ that reads “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.”</p>
14(29)	<p>Our Pre-Submission response questioned why the policy is asking for an assessment of potential pollution when the South Cambridgeshire Local Plan already asks for assessments on development through policies SC/10-Noise pollution, 9.54 ‘noise impact assessment’, SC/12-Air Quality, 7. ‘relevant assessment’, SC/14- Odour and Other Fugitive Emissions to Air 2 and SC/HQ-1 n, and CC/1. PAM14 should be demonstrably different, and local in nature, compared to the Local Plan policies.</p>	<p>We noted this earlier comment, responding that the policy is included to address parish specific concerns with respect to employment areas in Pampisford village.</p>
14(30)	<p>Our Pre-Submission response stated that there were not clear environmental receptors (areas which are places that could be harmed by pollution, i.e. parks, wildlife habitats) identified in the policy. We continue to suggest that Policy PAM14 should include</p>	<p>We pointed out earlier that the policy does refer to groundwater as an environmental receptor in particular with respect to the groundwater protection zone.</p>

PAM (Para)	SCDC comment	Parish Council response
	clearly identified environmental receptors that must be considered.	
15(31)	We recommend that that wording is added to PAM15 to reference PAM3, which is concerned with development abutting the Development Framework and a requirement to include a generous countryside buffer, which would appropriate and relevant to PAM15.	This is a reasonable suggestion.
16(32)	Our Pre-Submission response queried whether either of the policy points in PAM16 were distinct from PAM4? We continue to suggest the two policies are not demonstrably distinct from each other, are both policies required?	We agree that the two policies are closely linked. But as we responded to the same Reg 14 consultation comment, the distinction is that <i>PAM 16 refers specific to development coming forward at London Road employment area, where as Policy PAM 4 applies more broadly to proposals coming forward along London Road.</i>
17(33)	Our Pre-Submission response highlighted that the use of the word “harmony” is not generally used when it comes to considering the impact of development on heritage assets, and instead we highlighted paragraphs 199 to 208 of the NPPF which identifies that the impact on heritage assets should be measured in terms of “harm”. We note that the wording in policy PAM17 has been amended, however, we recommend further adapting the policy wording of the second point to read: “Development preserving or enhancing heritage assets..”, to ensure robust policy wording.	As recognised here, we amended the policy to refer to “conserving or enhancing” heritage assets.
17(34)	Regarding Rectory Farm Meadows in the supporting text at paragraph 6.17.1. As these meadows appear to be within the conservation area, we recommend replacing the fourth sentence that starts with ‘Rectory Farm Meadows ...’ with a sentence such as: “The special contribution which the open space at Rectory	We accept these proposed changes if important to ensure the Plan meets basic conditions. However, the proposed re-wording of the fourth sentence loses some information (the meadows being an

PAM (Para)	SCDC comment	Parish Council response
	Farm meadows makes to the conservation area (see Map 5) should be conserved or strengthened.” We further recommend the extent of Rectory Farm Meadows, and the Conservation Area, are illustrated on one map to provide clarity over how the different areas relate to each other.	attractive open area fronting Brewery Road and being visually quite prominent). We also suggest that the combination of maps 5, 9, 14 and 16 are sufficient. We have already prepared and inserted a new map (14) as a result of an SCDC comment at Reg. 14 consultation. If the local planning authority are willing to prepare the requested map we would be open to this.
18(35)	We suggest including supporting text that where planning consent is required that new country walking routes, and access to woodland, should include gateways and styles that are accessible for mobility scooter users, wheelchair users and walkers using sticks for guidance or balance. If any pathway surfaces are constructed these surfaces need be usable by these groups as well.	Following the Regulation 14 consultation, Community Action Point 4 was amended to state “The Parish Council will work alongside local landowners with respect to improving access for all users to the countryside surrounding Pampisford village. See aspirational footpath routes on Map 10.”
18(36)	We recommend the second paragraph of policy PAM18 is moved from the policy into the supporting text as planning applications cannot create a public right of way.	There is a precedent in the Waterbeach NP (Policy WAT 9 ‘Protecting and enhancing the provision and quality of Waterbeach’s walking routes including Waterbeach’s PROW network and bridleways). See also West Wickham NP (WWK/8: Access to the countryside, p.63) for the enhancement of Public Rights of Way through development proposals.
18(37)	We suggest replacement wording “Measures to improve and extend the existing network of public rights of way and bridleways will be supported particularly if their value as biodiversity corridors is recognised and safeguarded”.	We agree that this is an opportunity. However, it is not clear what this proposed wording is replacing. There is already this reference to biodiversity (para 6.18.2): New

PAM (Para)	SCDC comment	Parish Council response
		footpaths can also support PAM 12 on enhancing biodiversity.
19(38)	We recommend that at paragraph three of PAM19 the policy wording should read “preserve or enhance” not “conserve and enhance”.	We have no comment. We would however like the opportunity to correct an editing error in the third paragraph, third line where there is an extraneous parenthesis after the word ‘Gardens’.
19(39)	In the fourth part of policy PAM19, we recommend that the heritage statement provided should be “proportionate to the assets’ importance and sufficient to understand the potential impact of the proposal”, rather than proportionate to the scale of the development.	We would be happy with such an amendment.
General (40)	Whilst it is not a requirement to monitor a neighbourhood plan, we recommend including a section on monitoring as it will ensure that the Parish Council are able to review how effective policies are in practice and know when it is necessary to undertake a review of the Neighbourhood Plan.	We will wish to monitor the implementation of the NP and are happy to be guided on whether the Plan needs to state this.
Maps (41)	On page 7, paragraph 1.8 you have included wording “It should be noted that there is not one parish-wide Policies Map provided as part of this version of the NP. Instead, where a planning policy in Chapter 6 has site-specific implications, a policy map showing this is placed after the policy.” We suggest that the wording is amended to highlight that the policies maps are those referenced within the wording of the policies and suggest rewording paragraph 1.8 as “It should be noted that there is not one parish-wide Policies Map provided as part of this version of the Neighbourhood Plan. Instead, where a planning policy has site-	We agree with this proposed change.

PAM (Para)	SCDC comment	Parish Council response
	specific implications, a policies map showing the policy extent is included for that specific policy and referenced within the policy wording.”	
(42)	Map 10, page 57, is not referenced within any policy or supporting text, and therefore we suggest the map is not required. Or, that a reference is added within the supporting text or policy wording of policy PAM10.	This comment highlights a typo in paragraph 6.10.6, which should refer to Map 10 instead of Map 15.
(43)	Map 13, page 72, shows four employment areas, however policies PAM14 to PAM17 only relate to three employment areas. The fourth employment area identified on the map is referenced in the supporting text, and that same supporting text references a fifth employment area, but the map only includes one of these two additional employment areas. For clarity, we recommend that Map 13 should differentiate between the employment areas covered by Policies PAM14 to PAM17, and the additional employment areas shown for information only. We also recommend that both additional employment areas should be highlighted on the map, or that neither are shown on the map.	We accept the rationale here. The fifth employment area (outside of the area of Map 13) is Home Farm and is by far the smallest in scale and business activity. We propose that altering the caption of the map as below would be sufficient to address the comments here. Proposed caption to Map 13: <i>Employment areas in the parish: Brewery Road (see PAM 15), London Road (see PAM 16), Rectory Farm (PAM 17) and Solo Park (inset). A fifth employment area (Home Farm) is not shown.</i>
(44)	We suggest it would be helpful to have all heritage assets on one map and in the format of Map 16 which is easier to read. Clarity would be required on the map that it is only the NDHAs that go with the policy (PAM19), and the Listed Buildings and Conservation Area are shown for illustrative purposes only.	Whilst we understand this to be desirable we don't believe this change is required for the Plan to meet basic conditions. The Parish Council does not have budget for the preparation of new maps.
(45)	Our Pre-Submission response noted that the plan period is to 2041, whereas the adopted South Cambridgeshire Local Plan covers the period to 2031. The Council is preparing a new joint Local Plan that will extend into the 2040's, but this process is not expected to conclude until after the neighbourhood plan has been	Noted.

PAM (Para)	SCDC comment	Parish Council response
	<p>adopted. This may result in future in differences between the two plans reflecting the context within which both plans are being prepared. We will nevertheless seek to minimise any potential policy conflicts through that process, but it is important to be aware of the possibility of such conflict at this stage.</p>	
(46)	<p>We note that the references to the NPPF will need to be updated once a new NPPF has been published later in 2024, and these minor amendments can be made alongside any changes being made following examination of the Neighbourhood Plan.</p>	<p>Noted.</p>
Ch 1-5 (47)	<p>Our Pre-Submission response recommended that in chapter 3 evidence supporting the neighbourhood plan could also refer to South Cambridgeshire District Design Guide (2010) as this is an adopted SPD. In the District Design Guide, Pampisford is part of the ‘Chalklands’ character where a series of design principles are stated. Recently ‘made’ neighbourhood plans in Waterbeach and Gamlingay refer to the District Design Guide. It also highlighted the National Design Guide (2021). We continue to recommend the inclusion of this evidence and further to include a reference to the National Design Guide (2019) by the Ministry of Housing, Communities and Local Government.</p>	<p>As a result of the Pre-Submission comment, the following paragraph was added:</p> <p><i>3.15 The policies in the Pampisford NP have also been informed by evidence and policy documents prepared by other organisations. These include:</i></p> <ul style="list-style-type: none"> • <i>Greater Cambridge Landscape Character Assessment 2021, commissioned by the Greater Cambridge Shared Planning Service (GCSP) and undertaken by Chris Blandford Associates</i> • <i>Greater Cambridge Biodiversity Supplementary Planning Document (SPD), adopted by South Cambridgeshire District Council (SCDC) in February 2022</i> • <i>Greater Cambridge Sustainable Design and Construction SPD, adopted by SCDC in January 2020</i>

PAM (Para)	SCDC comment	Parish Council response
		<ul style="list-style-type: none"> • <i>Greater Cambridge Integrated Water Management Study, Level 1 Strategic Flood Risk Assessment, commissioned by Greater Cambridge Shared Planning Service and undertaken by Stantec in July 2021.</i> • <i>MAGIC, a multi-agency geographic information system, providing mapping applicable to the natural environment, managed by Natural England (www.magic.defra.gov.uk)</i>
Ch 6 (48)	We note that a number of the policies could be amended to be positively worded as per the NPPF (2023) paragraph 16, b. For example, removing terms like ‘will not be supported’.	We believe that the Plan itself is overwhelmingly positive. “will not be supported” is used only twice, when it needs to be, for example referring to developments that give rise to unacceptable levels of pollution impact.
App.1 (49)	We note that Appendix One is now an updated version of the Design Code due to agreed changes made through consultation responses. We suggest that wording is added throughout the Neighbourhood Plan to make clear that the Appendix One version of the Design Code is the version to use when making decisions on planning applications, and that it takes precedence over the 2021 version.	We agree that such wording could be usefully added, but it would be sufficient to do so in paragraph 3.3 alone (in section on Evidence supporting the Neighbourhood Plan).
App. 3 (50)	For the sake of completeness, it would be helpful to the user if reference was made to Map 6 at the start of the appendix in order that it can be seen where the viewpoint is.	We agree with this suggestion.

III Response to Cambridge Past Present and Future representation

	Comment	Parish Council response
	<p>Cambridge Past, Present & Future request that Policy PAM 12 and/or the supporting text make reference to the Local Nature Recovery Strategy and Cambridge Nature Network.</p> <p>Referencing the LNRS and the work of the CNN in Section 6.12 of the Neighbourhood Plan will help prioritise and direct biodiversity enhancements so that improvements within the parish are linked to wider biodiversity projects beyond the parish</p>	<p>Pampisford Parish falls on the southern extent of the area covered by the Cambridge Nature Network and we note the important biodiversity assets in and surrounding Pampisford Parish are not specifically recognised in that strategy. We also note that work is underway on the Cambridgeshire and Peterborough Local Nature Recovery Strategy.</p> <p>Nevertheless, it would be reasonable to include the following additional text in the third clause to the policy.</p> <p>“Appropriate measures for delivering biodiversity enhancements (including BNG where applicable) in the parish could include</p> <p>...</p> <p>iii) measures that complement wider biodiversity projects beyond the parish such as set out in the Cambridge Nature Network and the emerging Local Nature Recovery Strategy for Cambridgeshire and Peterborough”</p>

IV Response to Cheveley Park Farms representation

	Comment	Parish Council response
	<p>The draft neighbourhood plan fails to recognise major transport infrastructure that is planned within the neighbourhood plan area. Please see further details in attached letter and map.</p>	<p>Bidwells asserts that Map 15 in the NP should be amended to show land within the NP area that is safeguarded for the ‘Cambridge South East Transport Busway Travel Hub and associated development’. This would be inappropriate and problematic since Map 15 shows sites specific constraints relating to the statutory development plan only.</p> <p>The paragraph at the top of page 2 includes an implication (although this is not explicitly stated) that the Pampisford NP should be safeguarding land that might be needed for the delivery of CSET. Again, this would be inappropriate given the status of the project (Cambridgeshire County Council agreed 22 October 2024 to submit an application via a Transport and Works Act Order to government), and given that such a proposal has not had the benefit of community or stakeholder engagement as part of the Regulation 14 consultation on the Pampisford NP. Furthermore, it is beyond the scope (and likely in breach of the basic conditions) of the Pampisford Neighbourhood Plan to be determining the correct area of land to be safeguarded for the purpose of delivering strategic transport infrastructure and, on this point, there have been no comments provided to the Parish Council relating to this matter from the local planning authority, Cambridgeshire County Council or the Greater Cambridge Partnership.</p> <p>Finally, the Pampisford Neighbourhood Plan is focused on parish specific matters and does not contain planning policies relating to the direction of growth. Such matters are left to the Local Plan, currently South Cambridgeshire’s 2018 Local Plan. From this perspective it is not necessary for the Pampisford NP to include a policy specific to the CSET and were CSET Phase II to progress as intended, no policies in the NP would prejudice progress or delivery of the project.</p>