

Stapleford and Great Shelford Neighbourhood Plan. Report of responses received from statutory bodies during the Regulation 14 consultation 11 March to 30 April 2024

Responses before the deadline were received from:

Consultee Ref.	Organisation	Key notes on comments
S1	South Cambridgeshire District Council	A comprehensive response on most aspects of the plan
S2	Sport England	No specific comments on S&GS NP; submitted its own general guidance and NPPF policies supporting the development of sports facilities and improved health and wellbeing
S3	Cambridge County Council (Flood Risk Team)	Generally supportive of water- and climate-related policies in NP; suggests more consideration of flooding and related planning issues, including flood zone maps.
S4	Cambridge Group of the Ramblers Association	Generally supportive; would like more consideration of protecting permissive paths and links to routes outside of the NP area
S5	Historic England	Declined to comment on the detail of the NP
S6	Central Bedfordshire Council	Declined to comment
K1	Ely Diocesan Board of Finance (Carter Jonas acting on its behalf)	Broadly critical, especially of policies which could impact land behind Mingle Lane, Stapleford allotments and land off Haverhill Rd; does not meet basic condition (a) (i.e. Policies S&GS 2, 11, 12, 14, 20)
K2	Cambridge Past, Present & Future	Broadly supportive; a few specific comments
S7	National Gas	Confirmed that no assets exist within NP area
S8	National Grid	Confirmed that no assets exist within NP area
K3	Association for Cultural Exchange	Broadly supportive; would like more emphasis on chalk streams
S9	National Highways	Confirmed that has reviewed the NP and offers no comments
S10	Natural England	No specific comments on S&GS NP; general advice for NPs given
S11	Anglian Water	Overall supportive of the NP, subject to proposed amendments

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K4	Mr & Mrs Johnson (Chaplin Farrant Planning acting on their behalf)	Generally supportive; disputes policies impacting potential development site behind Hinton Way/Mingle Lane (notably S&GS 11 & 12)
S12	Cambridgeshire County Council (Lead Local Flood Authority (LLFA), Climate Change and Energy Services CCES), Education Place Planning (EPP), Historic Environment Team (HET)	A response on specific aspects of the Plan
K5	Magog Trust	Wholly supportive; a few specific comments
S13	Cambridgeshire County Council (Carter Jonas acting on its behalf)	Comments applicable to Policies S&GS 6, S&GS 11 and S&GS 20
K6	Peterhouse (Bidwells acting on its behalf)	Broadly critical, particularly of policies which could impact Greenhedge Farm land (notably Policies S&GS 11 & 14); S&GNP does not meet basic conditions
K7	St John's College (Savills acting on its behalf)	Comments applicable to Policies S&GS 14: Local Green Spaces and Protected Village Amenity Areas, S&GS 19: Protecting and improving routes into our countryside and S&GS 20: Stapleford and Great Shelford's Improved Landscape Area
S14	British Horse Society	Comments about broader equestrian access required, mainly on Policies S&GS 17 and S&GS 19; disagrees with Policies S&GS 17, 18, 19 & 20
S15	NHS Property Services	General comments related to Policy S&GS 16
K8	Great Shelford Ten Acres Ltd (Roebuck Land & Planning acting on its behalf)	Broadly critical, particularly of policies which could impact land adjoining Shelford Rugby Club; S&GNP does not meet basic conditions
K9	Swifts Local Network	Requests integrated swift/bird bricks to be included in Policy S&GS 9
K10	Grange Field (Land Partners LLP acting on its behalf)	Objects to Policies S&GS 11 & 14 as they relate to Grange Field

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Maps and figures	S1	The content of the maps is comprehensive with appropriate references to the Neighbourhood Plan's policies. Some of the maps, however, are formatted at a small scale or size resulting in reduced quality and legibility. It is suggested that the maps are produced at a high resolution, and we have identified some maps that would benefit from amending the base maps, legends, patterns, and colours. These have been identified in the relevant sections of the response to the draft Neighbourhood Plan. We welcome the opportunity to discuss map amendments and offer our support in recreating policy maps in order to improve the legibility of the maps, ahead of the Regulation 16 consultation.	Noted
Policies general	S1	Throughout the policies and supporting text of the Neighbourhood Plan, it is suggested where possible to use the wording 'shall' rather than 'should' for the wording to hold material weight. An example of this would be amending wording in Policy S&GS 6, where it says: "A design-led approach 'should' be taken for all proposals", to read "A design-led approach 'shall' be taken for all proposals".	Noted and accepted.
		Foreword	
General comments	S1	The addition of a foreword is noted and positively reflects suggestions from our informal comments.	Noted
		Introduction	
General comments	S1	We note that the plan makes no reference to consultation with businesses specifically, or as part of wider consultation. This is a requirement of the process, so it is suggested that clear reference to consultation with businesses is added either in the Plan, or is covered in	The Consultation Statement will report on all engagement undertaken, including with businesses.

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		the Consultation Statement that will need to accompany the Submission version of the Neighbourhood Plan.	
		Chapter 2: About Stapleford and Great Shelford	
Map 1, p11	S1	It is recommended that Map 1, on page 11 is rotated to be landscape, so that it is easier to read when viewing the document.	Noted and accepted.
		Chapter 3: Context to our Neighbourhood Plan	
General comments	K8	<p>It is important that the plan is prepared positively to support development, that it does not seek to hinder or thwart strategic development objectives in the local planning authority area but adds an additional layer of local detail to policies in the local plan and/or has locally distinctive policies relevant to the neighbourhood plan area. We recognise that the S&GS NP (2024-2041) is in an unusual situation where there is no up-to-date adopted local plan covering the same plan period to 2041 (the South Cambridgeshire 2018 Local Plan only dealing with strategic planning from 2011 to 2031) resulting in a lack of strategic direction and context. It is therefore important that the S&GS NP is capable of enduring post adoption of the emerging Greater Cambridge Local Plan (eGCLP) which will extend the Strategic Policies to at least 2041.</p> <p>A qualifying body must demonstrate how a neighbourhood plan contributes to the achievement of sustainable development. The National Planning Policy Framework identifies the three dimensions to sustainable development and recognises the need for the planning system to perform a number of roles:</p> <p>Social – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present</p>	Noted

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		<p>and future generations; and by creating a high-quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.</p> <p>Environmental – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.</p> <p>Economic – contributing to building a strong, responsive, and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.</p>	
General comments	K8	<p>It is not the intention of the S&GS NP to identify/allocate any new housing sites to 2041, rather its purpose is to address local considerations on matters of design and character etc. It is therefore of the up most importance that in these cases, Neighbourhood Plans are sufficiently flexible to respond to the district level issues/shortfalls to be positively prepared to help meet the current and future housing requirements of the district. This highlights the importance of planning for sustainable development, failure to do so or merely limiting development does not facilitate strategic objectives.³</p> <p>Furthermore, the S&GS NP acknowledges the proximity and influence of the Cambridge Biomedical Campus and its ambitious growth requirements. In order to support this locally (and nationally) important employment area, it is vital that residential accommodation is provided in sustainable locations and those settlements in close proximity, which includes Great Shelford, can help support this. There will be pressure on</p>	Noted

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		the existing sustainably located settlements to provide small-medium sized development in the eGCLP. This issue was set out in the previous Options consultation and Call for Sites exercise at the end of 2021.	
		Chapter 5: A vision for Stapleford and Great Shelford	
General comments	K1	The Vision for draft S&G SNP refers to addressing identified housing and affordable housing needs. The Housing Needs Assessment (AECOM March 2023) identified a high need for both social rent and affordable home ownership housing in the villages. It should be noted that affordable housing is mostly delivered in conjunction with market housing, and that rural exception schemes are typically small scale and provide a limited number of dwellings. The affordable housing requirement in the South Cambridgeshire Local Plan is for 40% of housing to be affordable from developments of 10 or more dwellings. As such, sufficient land to provide both market and affordable housing would need to be allocated to meet the identified affordable housing needs.	Noted. The policies in the S&GS NP allow for housing to come forward within the development frameworks. It also supports the delivery of rural exception sites. The NPPF 2023 does not allow for sites to be allocated in the Green Belt unless, the Green Belt has been agreed for release by the local planning authority. This case does not apply in the S&GS NP area.
General comments	K1	It would be appropriate for the Vision to seek to address those housing needs. However, as set out in this response, the draft S&G SNP does not seek to allocate any land to address housing and affordable housing needs, and does not provide any policy support for housing and affordable housing needs to be addressed through the emerging Greater Cambridge Local Plan.	Noted. The scope of a planning policy is limited to influencing planning applications, The proposed wording is not appropriate content for a planning policy
General comments	K1	It appears that draft S&G SNP seeks to introduce new policy designations that are clearly intended to limit development at the villages in the future, and to restrict potential options for the growth of the villages. It is unlikely that the aspirations in the Vision to address	This is an incorrect interpretation. Many of the policies in the S&GS NP do identify the importance of positive characteristics in the plan area so that these are recognised and appropriately

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		housing and affordable housing need would be achieved without positive policy support in draft S&GSNP to actually meet those needs.	protected when planning applications are prepared and being considered by the local planning authority
General comments	K1	No changes are requested to the Vision. However, draft S&GSNP should include an additional policy that supports the allocation of land for development at the villages through the emerging Greater Cambridge Local Plan process to meet housing and affordable housing needs.	The scope of a planning policy is limited to influencing planning applications. The proposed wording is not appropriate content for a planning policy.
Para 5.2	K1	<p>Paragraph 5.2 identifies 10 theme-based objectives for draft S&GSNP. These objectives are appropriate. It is noted that the objectives related to housing, biodiversity, community amenities and infrastructure, and countryside enhancement all refer to development, and it is assumed that development would support the delivery of those objectives. However, as set out in this response, draft S&GSNP does not allocate any land for development and does not provide any policy support for development to be brought forward in the future through the emerging Greater Cambridge Local Plan process. It is unlikely that those objectives that are associated with the delivery of additional development would be achieved without specific policy support for development.</p> <p>No changes are requested to the objectives. However, draft S&GSNP should include a policy that supports the allocation of land for development at the villages through the emerging Greater Cambridge Local Plan process to deliver the housing, biodiversity, community amenities and infrastructure, and countryside enhancement related objectives.</p>	The NP objectives are considered to be appropriate. The scope of a planning policy is limited to influencing planning applications. The proposed new policy content here would have no purpose
Vision	S13	The Vision for draft S&GSNP refers to addressing identified housing and affordable housing needs. This does not account for the potential	The S&GS NP recognises the existing planning policy context with respect to

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		expansion of the Biomedical Campus and the acute need for high quality employment space	<p>plans to expand the Biomedical Campus. New employment provision in the plan area is expected to be delivered through Local Plan Policy E/2 (Cambridge Biomedical Campus Extension) in South Cambridgeshire's 2018 Local Plan. The eGCLP is also expected to set out the strategic strategy and policies with respect to employment allocations beyond 2031.</p> <p>Map 2 in the S&GS NP illustrates spatial implications of Local Plan policies including land allocated in Great Shelford parish as part of Policy E/2 in the Local Plan. This land is adjacent to the existing campus (which currently all falls outside the S&GS NP area) and is allocated for employment (B1), higher education and sui-generis medical research uses. The accompanying text to Map 2 in the S&GS NP will be updated to explain this more clearly.</p> <p>It is not appropriate for the S&GS NP to second guess the strategic employment sites that will be included in the future adopted GCLP (the work published to date would indicate the eGCLP proposes to release Green Belt land to the east of the Cambridge</p>

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			Biomedical Campus and on land that falls outside the S&GS plan area). Furthermore, all of the land that falls within the S&GS NP area and that is not within the boundaries of Local Plan site allocation E/2 is part of the Cambridge Green Belt. National policy prevents neighbourhood plans from directing growth to the Green Belt.
Vision	S13	It would be appropriate for the Vision to support further employment development around the Cambridge fringe, subject to management of any impacts on the village. Expansion of the Biomedical Campus has the potential to deliver substantial contributions towards creation of new amenities and infrastructure within the villages to meet the needs of the population.	Noted. However, as discussed above, whilst the existing Local Plan context with respect to the Biomedical Campus is accounted for in the S&GS NP, there is no need for the S&GS NP vision to be amended in light of this. The vision must reflect what a NP can cover and therefore the contents of our NP. We are unable to develop policies to support employment development around the Cambridge fringe. This is because all of the land that falls within the S&GS NP area and that is not within the boundaries of Local Plan site allocation E/2 is part of the Cambridge Green Belt. National policy prevents neighbourhood plans from directing growth to the Green Belt.
Vision	S13	However, as set out in this response, the draft S&GSNP does not provide any policy support for employment and housing needs to be	The S&GS NP will, once made, sit alongside the currently adopted 2018

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		<p>addressed through the emerging Greater Cambridge Local Plan. It appears that draft S&GSNP seeks to introduce new policy designations that are clearly intended to limit development at the villages in the future, and to restrict potential options for the growth of the villages. It is unlikely that the aspirations in the Vision to address infrastructure and community development without positive policy support in draft S&GSNP to actually meet those needs.</p>	<p>Local Plan and in the future the GCLP. The policies in the S&GS NP are compatible with strategic policies in the 2018 Local Plan (including Local Plan policy E/2: Cambridge Medical Campus Extension). The villages are surrounded by the Cambridge Green Belt. This is a strategic policy designation that the NP cannot amend. A NP cannot allocate sites for development within the Green Belt. The overall spatial strategy for the area is therefore established through the higher-level plan and the S&GS NP does not include a policy that directs development to specific locations.</p> <p>The S&GS NP is sufficiently flexible to be compatible with a revised strategic spatial strategy.</p> <p>Many of the policies in the S&GS NP do identify the importance of positive characteristics in the plan area so that these are recognised and appropriately protected when:</p> <ul style="list-style-type: none"> - planning applications are prepared and being considered by the local planning authority

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			<p>- the emerging Greater Local Plan is being progressed.</p> <p>With regards to community infrastructure, all development will be required to contribute towards the provision of community infrastructure in line with policies in the S&GS NP (once made) and in line with the adopted Local Plan.</p>
Vision	S13	No changes are requested to the Vision. However, draft S&GSNP should include an additional policy that supports the allocation of land for development at the villages through the emerging Greater Cambridge Local Plan process to meet housing and employment needs.	The scope of a planning policy is limited to influencing planning applications. The proposed additional policy would have no purpose.
Para 5.2	S13	Paragraph 5.2 identifies 10 theme-based objectives for draft S&GSNP. These objectives are appropriate. It is noted that the objectives related to housing, biodiversity, community amenities and infrastructure, and countryside enhancement all refer to development, and it is assumed that development would support the delivery of those objectives. However, as set out in this response, draft S&GSNP does not allocate any land for development and does not provide any policy support for development to be brought forward in the future through the emerging Greater Cambridge Local Plan process. It is unlikely that those objectives that are associated with the delivery of additional development would be achieved without specific policy support for development.	The NP objectives are considered to be appropriate.
Objective 3	S12 (CCES)	The County Council fully supports Neighbourhood Plan's objective in respect to climate change.	Noted.

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Objectives	S13	No changes are requested to the objectives. However, draft S&GSNP should include a policy that supports the allocation of land for development at the villages through the emerging Greater Cambridge Local Plan process to deliver the housing, biodiversity, community amenities and infrastructure, and countryside enhancement related objectives.	The scope of a planning policy is limited to influencing planning applications. The proposed additional policy would have no purpose
		Chapter 6: Housing and the built environment	
General comments	K1	It is noted that there are no housing allocations identified in draft S&GSNP, and no policy support for housing to be allocated in the villages through the emerging Greater Cambridge Local Plan process in the future, despite the evidence of a need for affordable housing for social rent and home ownership. The draft S&GSNP includes policies for new community infrastructure and specifically open space and play space, but no land is allocated for development that could support the delivery of that community infrastructure.	The inclusion of a site allocation in the NP is not a pre-requisite for development coming forward. For example, the principle of development is established within the development frameworks. It is also acknowledged that development could come forward via strategic site allocations in the eGCLP ¹ , once it is progressed and adopted. All development will be required to contribute towards the provision of community infrastructure in line with policies in the Neighbourhood Plan (once made) and in line with the adopted Local Plan.
General comments	K1	Emerging Greater Cambridge Local Plan In Policy S/13 of the adopted South Cambridgeshire Local Plan the Council committed to undertake an early review, including to address	Noted

¹ Currently proposed on land between Hinton Way and Mingle Lane.

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		<p>matters related to housing need. A call for sites exercise, issues and options consultation, and preferred options consultation for the emerging Greater Cambridge Local Plan were undertaken between 2019 and 2021. The Preferred Options consultation document contained a development strategy based on a medium plus growth option and a very limited amount of development directed to the villages. It is proposed in the Preferred Options document that Stapleford and Great Shelford continue to be classified as Rural Centres in the settlement hierarchy, and that these villages would be within a new Rural Southern Cluster which seeks to connect employment growth to housing in an accessible location. The Preferred Options document identified a preferred housing allocation at land between Hinton Way and Mingle Lane in Great Shelford for 100 dwellings.</p>	
General comments		<p>The evidence published in January 2023 for the emerging Greater Cambridge Local Plan indicates that because of economic growth in key sectors of the economy there is a higher housing need in Greater Cambridge. In 2023 the Government announced its aspiration for the significant growth of Cambridge, and the Budget in March 2024 included a commitment to funding and support for additional housing and economic growth. It is likely that the draft version of the emerging Greater Cambridge Local Plan would need to amend the preferred development strategy to address the evidence of a higher housing need and the Government's aspirations for growth. It is likely that additional site allocations in the more sustainable villages, including Stapleford and Great Shelford, would be part of an emended development strategy in the emerging Greater Cambridge Local Plan.</p> <p>It is considered that draft S&GSNP should take a much more positive approach to meeting housing and affordable housing needs of the villages, and should not introduce policies that are clearly intended to</p>	<p>The S&GS NP does support housing development within the development frameworks and as part of rural exception sites. It is not within the gift of a NP to allocate Green Belt land for housing. Many of the policies in the S&GS NP do identify the importance of positive characteristics in the plan area so that these are recognised and appropriately protected when:</p> <ul style="list-style-type: none"> - planning applications are prepared and being considered by the local planning authority - the emerging Greater Local Plan is being progressed."

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		limit development at the villages in the future and to restrict options for the growth of the villages through the emerging Greater Cambridge Local Plan process.	
General comments	K6	<p>'Great Shelford & Stapleford' is identified as a Rural Centre in the Local Plan 2018 (Policy S/8), sitting alongside the settlements of Cambourne, Cottenham, Histon/Impington and Sawston at the top of the Settlement Hierarchy. Rural Centres are the most sustainable settlement type within the hierarchy and are recognised as the <i>"largest, most sustainable villages of the district"</i> (Local Plan, paragraph 2.55), having good access to education, employment, services and facilities and public transport services.</p> <p>Compared with other villages and settlements lower in the hierarchy, for which development thresholds are set out in development plan policy, the Local Plan states that <i>"Since the Rural Centres comprise the most sustainable villages in South Cambridgeshire there is no strategic constraint on the amount of development or redevelopment of land for housing that can come forward within the development frameworks"</i> (paragraph 2.56).</p> <p>Whilst very limited weight can be given to the emerging Greater Cambridge Local Plan (eGCLP) in the determination of planning applications, it provides a useful reference for the direction of travel of policy at the strategic level. Based on an updated assessment, which was informed by the level of services and facilities, education, public transport and employment available at each settlement, the First Proposals consultation (2021) retains a Settlement Hierarchy for Greater Cambridge under Draft Policy S/SH. This retains Great Shelford & Stapleford as a Rural Centre.</p>	Noted

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General Comments	K6	We are conscious that there has been a delay in the preparation of the eGCLP, and that further consultation will be delayed until 2025. However, we would note that updated jobs and housing evidence papers in late 2022 indicated higher growth figures for Greater Cambridge than was originally envisaged by the councils. Subsequent to this, central government has identified Cambridge and its hinterland as a key location for economic growth of national significance. How this will work its way into policy and planning practice remains to be seen, but there is a strong policy imperative for additional development to support economic growth, not least in the sustainable settlements that support key employment locations such as the Cambridge Biomedical Campus and southern cluster. Given the strategic location of S&GS and its status as a Rural Centre, further growth is likely to be needed within the settlement and the emerging S&GSNP is an opportunity for the local community to consider the best locations for future development.	It is not within the gift of a Neighbourhood Plan to set the agenda for strategic growth strategy in the higher level plan.
General comments	K6	Chapter 6 of the Regulation 14 S&GSNP deals with matters relating to housing and the built environment. We support Objective 1 (Housing) of the Regulation 14 S&GSNP, which states that “ <i>New residential development proposals will contribute to addressing existing and future housing needs in Stapleford and Great Shelford in terms of affordability, accessibility, tenure and its suitability for all stages of life.</i> ” We note that this objective informs five planning policies relating to housing matters; however, none of these policies include a housing requirement figure for the plan period, and neither are there any housing allocations included within the Regulation 14 S&GSNP.	Noted
General comments	K6	The National Planning Policy Framework (“NPPF”)(December 2023) places significant emphasis on the role of the planning system in ensuring the delivery of a sufficient supply of homes.	The indicative housing requirement figure for the plan area, and provided by the local planning authority is 45

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		<p>Paragraph 67 of the NPPF requires strategic policy-making authorities (i.e. South Cambridgeshire District Council or Greater Cambridge) to establish a housing requirement for their area. With respect to neighbourhood planning, it states that:</p> <p><i>“67. ...Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations...”</i></p> <p><i>68. Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.”</i></p> <p>The adopted Local Plan 2018 includes a housing requirement for South Cambridgeshire District, but it does not set individual requirements for designated neighbourhood areas. We would be keen to understand if the Steering Group has approached the Local Planning Authority (“LPA”) to request an indicative housing requirement figure for the neighbourhood plan area.</p>	<p> dwellings to be delivered during the period 2017 to 2031. This figure is comfortably met through existing planning permission, completions and with sites under construction. As at March 2023, 5 dwellings had been completed in Stapleford parish and 82 in Great Shelford. As at March 2023, a further 51 dwellings had been permitted but not completed in Great Shelford parish; and a further 147 dwellings had been permitted not commenced in Stapleford parish.</p>
General comments	K6	<p>The S&GS Housing Needs Assessment (HNA) 2023 provides a range of useful information on local housing matters. However, regarding the “Quantity of housing to provide” this is limited to paragraphs 54 and 55 of the HNA, and the explanation set out here is somewhat confusing. Paragraph 54 refers to the NPPF requirement for LPAs to provide definitive or indicative housing numbers for neighbourhood plan areas (as above). However, paragraph 55 of the HNA states as follows:</p>	<p>It is a requirement of the local planning authority to provide an indicative housing requirement figure for its plan period. This will apply to South Cambridgeshire’s 2018 Local Plan. The S&GS NP plan period however stretches up to 2041. The point being made in paragraph 55 of the HNA is</p>

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		<p><i>“55. South Cambridgeshire has fulfilled that requirement by providing Stapleford & Great Shelford with an allocation of 100 dwellings in the emerging Local Plan to be delivered by 2041. It should be noted that the Neighbourhood Plan period runs to 2043 and so there may be further housing required for the NA over the extended period. There is also the potential for windfall proposals for residential development coming through planning applications.”</i></p> <p>From recent appeal decisions it has been confirmed by the Planning Inspectorate and the Secretary of State that very limited weight can be given to the eGCLP. In addition, and as set out above, since the First Proposals (2021) there has been additional local evidence and further national policy impetus which indicate that a greater quantum of development will be required during the plan period. Hence, we are concerned that a single draft allocation dating from 2021 is being referenced in this way. In short, a draft site allocation for 100 dwellings is not the same as a housing requirement figure for the S&GSNP area.</p>	<p>that the emerging Greater Cambridge Local Plan has anticipated a need for additional growth in the plan area and, has identified a potential site for delivering this growth. The HNA has been updated in order to be clearer in relation to this.</p>
General comments	K6	<p>Given the identified need for housing in the local area, balanced against the increased strategic imperative for further and additional growth in Greater Cambridge, we are of the view that the S&GSNP should clearly set out the housing requirement for the plan period. Without this, the S&GSNP is failing to plan positively for future growth.</p> <p>In terms of identifying land for homes, in addition to the role of strategic policy-making authorities, the NPPF makes specific reference to neighbourhood plan groups at paragraph 71:</p> <p><i>“71. Neighbourhood planning groups should also give particular consideration to the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 70a) suitable for housing in their area.”</i></p>	<p>It is a requirement of the local planning authority to provide an indicative housing requirement figure for its plan period. This will apply to South Cambridgeshire’s 2018 Local Plan. It is a requirement of the Neighbourhood Plan to then allow for this to be delivered.</p>

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		Alongside a need for a housing requirement figure, we are of the view that the S&GSNP should consider the opportunity to identify specific housing sites for development during the plan period.	
General comments	K8	<p><i>Presumption in favour of sustainable development:</i></p> <p>The fundamental principle of the National Planning Policy Framework is the presumption in favour of sustainable development. The submitted evidence base includes a local housing needs survey to inform proposed local development management policies. The Greater Cambridge area has agreed the use of the standard method for calculating housing requirements based on Local Housing Need for its emerging Local Plan. This amounts to land for at least 11,640 new homes. This is a considerable amount of development and given that Stapleford and Great Shelford parish boundaries adjoin the Cambridge City boundary, the combined suite of policies in the S&GS NP to 2041 could restrict growth and not support opportunities for the expansion of two of the most sustainably located rural settlements in South Cambridgeshire and/or to meet identified housing needs for the Greater Cambridge area.</p>	This observation neglects to take into account the two villages are surrounded by the Cambridge Green Belt. The ‘fundamental principle’ referred to here is a reference to paragraph 11 in the NPPF 2023. Footnote 7, which is referenced twice in this paragraph, is clear that Green Belt designation is an example of a policy that ‘protects areas or assets of particular importance’.
General comments	K1	The plan period for draft S&GSNP is 2024 to 2041. The adopted South Cambridgeshire Local Plan has a plan period from 2011 to 2031, and this is the development plan that draft S&GSNP will need to be in general conformity with when examined. The proposed plan period for the emerging Greater Cambridge Local Plan is from 2020 to 2041, but this might need to be extended once future development needs have been confirmed and growth aspirations are taken into account. The strategic policies in the emerging Greater Cambridge Local Plan would, once adopted, supersede any policies and designations that overlap with one another.	Where Neighbourhood Plans are made, they sit alongside the adopted Local Plan. Together they provide the decision-making framework for future development. The proposals currently set out in the eGCLP include a draft site allocation. There is no need for the S&GS NP to add to this. Furthermore, it is not appropriate for a plan to allocate land for development in a

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		<p>It is possible for neighbourhood plans to have a different plan period to other adopted development plan documents. However, the main concern with the plan period for draft S&GSNP is that the housing needs assessment identifies housing and affordable housing needs for the period to 2041, but draft S&GSNP does not seek to meet those needs or provide any policy support for those needs to be addressed through the emerging Greater Cambridge Local Plan process. In addition, draft S&GSNP also seeks to introduce new policy designations that are clearly intended to limit development at the villages in the future, and to restrict potential options for the growth of the villages.</p> <p>It is suggested that, if the plan period for draft S&GSNP remains as 2024 to 2041, an additional policy is included so that identified development needs for that period can be addressed.</p>	<p>Green Belt location, unless it is proposing to release that land from the Green Belt. It is not within the gift of a NP to release land that is in the Green Belt. See paragraph 145 of the NPPF 2023</p>
General comments	K8	<p>Plan Period:</p> <p>The S&GS NP covers the 17 year period from 2024 to 2041. The eGCLP is being prepared whilst it is acknowledged that the S&GS NP does not have to reflect the same plan period as the eGCLP, it is important to understand that there may be a new spatial strategy and growth figures in the eGCLP that may affect the content of this plan and this presents a risk to the work of the parish councils as the qualifying body.</p> <p>The joint district authorities published a First Proposals draft plan options for consultation in November 2021. The S&GS NP briefly acknowledges that process and the proposed green belt release included at the time at paragraph 3.5. However, this early draft options eGCLP is susceptible to change and is likely to extend its plan period (due to delays from the water cycle studies/issues and no longer proceeding under the transitional rules for plan-making).</p>	<p>The S&GS NP does not include a policy that directs the location of new development. This is left, in this case, to the higher level plan. The S&GS NP is therefore sufficiently flexible to be compatible with a revised strategic spatial strategy.</p>

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		<p>The eGCLP will need to include proposed site allocations to meet needs to at least 2041 and potentially longer. As the S&GS NP does not align with the adopted Local Plan period where the strategic policies and growth requirements are known, it runs the risk of being out-of-date shortly after the eGCLP intended adoption date in 2027/28. It is therefore important to ensure that the S&GS NP policies are flexible and adaptable to changes at both the national and district level to enable it to have longevity for more than 12-24 months after it could potentially be 'Made.' As the early evidence indicates that the emerging growth strategy requires the release of Green Belt land around Cambridge, including in the S&GS NP area, the plan needs to include a clear statement or policy acknowledging this. Whilst GB policy is strategic and cannot be altered through a neighbourhood plan, the S&GS NP should include specific provisions to account for emerging strategic policy changes.</p>	
General comments	K8	<p>Proposed Change: The S& GS NP should either be reduced to align with the adopted Local Plan period to 2031. Alternatively, it should include greater flexibility to account for any changes that might emerge through the strategic policies for the period to 2041.</p> <p>This could include a specific policy dealing with development proposals beyond the built-up boundary to include exception sites and land identified for development in the eGCLP.</p> <p>Alternatively, the S&GS NP could clearly state that the future growth strategy is not yet known and include a general policy acknowledging the limitations. The S&GS NP could include a trigger for monitoring and review, the adoption of the emerging local plan being a key milestone, such as:</p>	<p>There is no policy in the draft S&GS NP that directs development to particular locations since this is left, in this case, to the higher level plan. Policies S/7: <i>Development Frameworks</i> and Policy S/9: <i>Minor Rural Centres</i> are therefore of key importance. This spatial strategy will be updated when the eGCLP is adopted and it is this that will sit alongside the S&GS NP.</p>

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		<p><i>Policy X – As the strategic growth requirements are not yet fixed for the neighbourhood plan period to 2041, the S&GS NP may require updating. An early review will be undertaken to update the S&GS NP for the period beyond 2031 to take account of any changes in strategic policies affecting the designated NP area.</i></p>	
General comments	K8	<p>Concise, Precise and Supported by Appropriate Evidence:</p> <p>The National Planning Policy Guidance (NPPG) states: “A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.” (National Planning Practice Guidance Para 041).</p> <p>GSTA acknowledges that the issues and timings of the eGCLP review has not been helpful in guiding the preparation of the S&GS NP preparation. The S&GS NP correctly identifies the NPPF compliant strategic policies of the 2018 Local Plan as being those which it must be in general conformity along with the fact it cannot define or amend the Cambridge Green Belt.</p> <p>Whilst a Neighbourhood Plan can proceed ahead of preparation of a Local Plan, the guidance states at Paragraph 009:</p> <p><i>“They can be developed before or at the same time as the local planning authority is producing its Local Plan. A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft Neighbourhood Plan or Order is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan</i></p>	<p>Where Neighbourhood Plans are made, they sit alongside the adopted Local Plan. Together they provide the decision-making framework for future development. In this particular plan area, the spatial strategy is established in the higher level plan, currently South Cambridgeshire’s 2018 Local Plan. This position is largely a result of the Cambridge Green Belt that surrounds the two villages; it limits the policy options available</p>

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		<p><i>process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested”.</i></p> <p>It goes on to state:</p> <p><i>“For example, up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development [our emphasis]. Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:</i></p> <ul style="list-style-type: none"> <i>• the emerging neighbourhood plan</i> <i>• the emerging Local Plan</i> <i>• the adopted development plan with appropriate regard to national policy and guidance.</i> <p><i>The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination. The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans”.</i></p> <p>In the eGCLP, Great Shelford is one of the Settlements under consideration for additional growth/GB release given its sustainable locations with good transport links (i.e. rail and road) and accessibility to Cambridge city centre, the Cambridge Biomedical Campus and the nearby research and technology employment parks and is well-placed to accommodate additional development to 2041.</p> <p>To ensure that much needed housing is delivered, as the S&GS NP cannot actively promote development on Green Belt land, it should</p>	

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		include sufficient flexibility to meet a range of identified needs while the eGCLP is progressing. The combination of policies in the S&GS NP, when read as a whole, limit additional growth to 2041 and beyond to exception sites for affordable housing only for those only with a local connection and not to meet other identified needs in the combined authority area such as Key Workers or other employment-led requirements/essential local workers. GSTA also suggest some alternative wording to the suite of policies:	
		Policy S&GS 1: Housing Mix	
General comments	K4	<p>Whilst the neighbourhood plan provides significant evidence and commentary as to the need for smaller houses, and the need for affordable housing it does not even attempt to suggest how the needs of the the neighbourhood plan can attempt to address these.</p> <p>It is contended that the plan fails to accord with the advice contained at paragraph 29.of the National Planning Policy Framework which states that "Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies".</p>	The S&GS NP does not promote less development than that set out in the strategic policies, or undermine those strategic policies.
General comments	K4	In the case of this plan and as detailed below in the assessment of Policy S&GS 13 the plan is seeking to render the proposed allocation S/RSC Other site allocations in the southern cluster - Proposed Housing Allocations S/RSC/HW - Land between Hinton Way and Mingle Lane, Great Shelford undeliverable. It is also seeking to promote less	The villages are both surrounded by the Cambridge Green Belt, a strategic policy designation that the NP cannot amend. A NP cannot allocate sites for development within the Green Belt.

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		<p>development than that being suggested by the emerging Strategic Plans for the area. The question has to be raised whilst there was clear support for additional housing in the Neighbourhood Plan, has the plan been developed to safeguard the interests of the residents on Mingle Lane and Gog Magog Way.</p> <p>There are also questions as to why the plan has been created now i.e. 2 years prior to the adoption of the Greater Cambridgeshire Local Plan. It would appear to be focused on trying to influence the plan making process. Although as advised at Paragraph 30 of the NPPF "Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently".</p> <p>The proposed allocation S/RSC/HW was considered to demonstrate exceptional circumstances for Green Belt release due to it being very well located in relation to the existing railway station, with resulting excellent access to Cambridge and to Cambridge Bio-medical campus once the new Cambridge South Station is open.</p>	<p>The overall spatial strategy for the area is therefore established through the higher-level plan and the S&GS NP does not include a policy that directs development to specific locations. The S&GS NP is sufficiently flexible to be compatible with a revised strategic spatial strategy.</p> <p>Should the land between Hinton Way and Mingle Lane be allocated in the GCLP, then the policies in the S&GS NP will help ensure the development comes forward in a way that is sensitive to current surroundings. This means ensuring key features of the currently valued views S and T are preserved and ensuring the important countryside gap along Mingle Lane is respected so that the relationship between the village and wider countryside setting is retained."</p>
General comments	S14	Regarding development and design – there is nothing within this section to set policy on mitigation for the existing community for development permission. There needs to be some reference to expecting any new large-scale development to provide benefits for the existing community in terms of funding for access or provision of green spaces together with access.	Policy S&GS 17: Delivering community infrastructure priorities alongside new development is relevant; it identifies the improvement of access to natural green space as a priority alongside new development. See also Policy S&GS 20: Protecting and improving routes

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		Peripheral bridleways (the best form of inclusive access other than restricted byways) should be required to be provided. This can benefit all residents as well as ‘softening the edges’ of built form so long as rural and natural surfacing is adopted – examples can be seen at Cambourne and the eastern side of the Marleigh Development, Newmarket Road, Cambridge. People love to feel they have a connection with the countryside even when they are in inner urban areas. The benefits of the countryside on mental and physical wellbeing is very well documented. Seen from the raised areas such as the Drift Track, Stapleford is nestled in a ‘green duvet’. That is something which needs preserving and demanding for the future.	into our countryside – this refers to circumstances when improvements towards public rights of way will be required as part of development.
Supporting paragraphs	S1	Our informal comments from December 2023 suggested that paragraphs should be amended to be clearer and in accordance with the Council’s Interim Position Statement on First Homes. Subsequent inclusion of this reference in paragraph 6.23 is supported.	Noted
Supporting paragraphs	S1	Informal comments highlighted the need to provide affordable rents in line with the Greater Cambridge Housing Strategy (2019) affordable rent policy. The updates in paragraph 6.25 do not include the recommended reference but paragraphs do not conflict with the Greater Cambridge Strategy.	Noted
Supporting paragraphs	S1	We previously recommended clarification as to what is meant by ‘further residential development’, this has been amended in paragraph 6.25 to show New Affordable Housing Supply only, and is clearer in wording.	Noted

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Supporting paragraphs	S1	Informal comments highlighted that the proposal to adopt First Homes as the baseline conflicts with the Council's Interim Position Statement. Paragraph 6.23 still proposes First Homes as the baseline, but wording has been amended to reflect that SCDC has not adopted First Homes, and notes the interim Position Statement for where developers bring forward First Homes. It also includes tenure split that is consistent with the Interim Position Statement.	Noted
Policy text	K1	Policy S&GS 1 sets out the preferred housing mix for residential developments. However, it is noted that draft S&GSNP does not allocate any land for development and does not provide any policy support for development to be brought forward in the future through the emerging Greater Cambridge Local Plan process. Therefore, it is not clear how the preferred housing mix set out in Policy S&GS 1 would be delivered without additional development.	The delivery of development in the plan area is not contingent on the inclusion of site allocations in a NP. Once adopted, the S&GS NP will sit alongside the adopted Local Plan to provide the decision-making framework for future development. For instance, the principle of development is established within the development frameworks.
Policy text	S1	What is the scale of the opening statement 'where the scale permits'? Policy H/9 of the adopted SCDC Local Plan, states a threshold of 10 dwellings, therefore the Neighbourhood Plan should set the same threshold to be in conformity.	It is not accepted that Policy S&GS 1 can only apply to schemes of 10 or more dwellings. The wording has been amended to increase clarity
Policy text	S1	It was recommended that part a) of Policy S&GS 1 was clarified, as to whether the AECOM Housing Needs Assessment (HNA) identified the requirement for at least 50% of new affordable dwellings to be 3 bedroom with the remaining units a mixture of 1, 2 and 4 bedroom units as this was contrary to the split required in the SCDC affordable housing	Noted. Further changes made in light of this comment and follow up liaison with SCDC.

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		<p>needs for Stapleford and Great Shelford (South Cambridgeshire District Council, Housing Register, Home-Link, April 2024).</p> <p>Table 6.14 has been added to highlight affordable need and links to the SCDC housing register. Another bullet point has been added to the Policy to refer to 'where affordable homes are being provided, the housing mix should respond appropriately to the identified high need for 1-and 2-bedroom units'. These additions help provide clarity, however, the policy does not define what would be 'appropriate' in responding to the identified high need, and where the high need is identified.</p>	
Policy text	S1	<p>Our informal comments asked for clarification in part b) of Policy S&GS 1, as to where the supporting evidence came from for 40% discount on First Homes, and the need to provide evidence as to why the standard 30% is not feasible as this goes against the Council's interim Position Statement and existing Policy. Page 23 of the Housing Needs Assessment provides findings of 40% discount, but SCDC Housing Officers are still concerned that 40% is not appropriate given National Guidance is set at a discount of 30%. The GL Hearn report on housing needs for specific groups suggests 22%-33% discount is affordable. Increased discounts from 30% would lead to viability challenges and potential overall reduction in affordable housing. We welcome further discussion with the Parish Council on alternative ways to secure First Homes, particularly through recommendation for a Local Connection Criteria for all the First Homes on First Home Exception Sites or First Homes on Rural Exception Sites (subject to the findings from a Housing Needs Survey).</p>	Noted. Further changes made in light of this comment and follow up liaison with SCDC.
Policy text	S1	<p>For Policy S&GS 1, part b), the reference to affordable homes being provided as 'affordable in perpetuity' should be removed, as this statement cannot be achieved because the homes are within the</p>	Noted. Amendment made.

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		development framework boundary. It is recommended that wording is amended to read 'where affordable homes are being provided, they should meet the following tenure mix'.	
Policy text	S1	Policy S&GS 1, part b), where it states 'with shared ownership at 10% equity more affordable than First Homes', it is unclear. Is this trying to say that you can buy shared ownership units from a 10% share?	Noted. Further changes made and this issue has been resolved.
Policy text	S1	Informal comments recommended deleting point 2 of Policy S&GS 1, that reads: 'proposals providing an alternative mix to that set out above must be supported by up to date evidence of existing and future needs in the plan area'. This has not been deleted. We recommend it is removed, as it is not the responsibility of the developer to provide evidence for a S106 site (a site in the development framework boundary). The initial conversation should be as per the SCDC Local Plan for a 70/30 split of social and affordable rent and shared ownership.	Noted but not accepted. This was also resolved as part of follow on discussions with SCDC.
Policy text	S1	Informal comments asked for clarity on point 3 of Policy S&GS 1, that reads: 'new housing should be built to the accessible and adaptable M4(2) standard.' We explained that at present 5% M4 (2) is required in the existing planning, and therefore the Neighbourhood Plan cannot insist on 100% M4 (2). No changes have been made and our advice to remove the policy requirement remains the same.	Noted but not accepted. This was also resolved as part of follow on discussions with SCDC.
Policy text	K8	We welcome the flexibility provided by this policy by reference to it being 'a starting point'. This should be maintained through to the Regulation 16 draft policy. Limb 2 should recognise the locational position of the villages in the district and at the Cambridge city edge. The draft policy does not account for meeting the wider needs of the district in a sustainable	Any residential development coming forward within the NP area should be appropriate to contributing towards addressing existing needs in the settlement. This is good place making.

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		<p>location and may not have longevity. It only deals with homes for specific, qualifying local connections test.</p> <p>Policy S&GS 1 does not therefore meet the NPPF criteria. It serves to restrict development other than those exceptions. The NPPF is clear that rural exception sites (which can include market housing) and First Home exception Sites are permissible outside of settlement limits.</p> <p>This policy is conflicting and not helpful for decision-takers to interpret. The policy as written has the potential to exclude other permissible growth at the edge of settlements on unallocated land such and does not take account of national policy and guidance. Accordingly, it does not meet Basic Condition a.</p> <p>Proposed Change: Add additional criteria to Limb 2 and reword policy.</p> <p>A suggested change for Limb 2 is:</p> <p><i>2. Proposals providing an alternative mix to that set out above must be justified by reference to up-to- date evidence of existing and future needs in the Plan area or in meeting district-wide needs if there are special reasons why the development in the form proposed needs to be there".</i></p>	Policy S&GS 1 is a housing mix policy and does not comment on the location of development
Clarification of terms	S1	<p>Informal comments asked for the term 'affordable rent' to be in line with SCDC affordable rents policy. Page 35 has been amended to link to the policy, but the wording does not specifically state that rents should align. It is recommended that wording reflects the need for alignment with SCDC policy. It is also important to note that the Greater Cambridge Housing Strategy is currently being reviewed, and will be later superseded by this document: Greater Cambridge Housing Strategy (scambs.gov.uk). Annex 4 refers to the affordable rents policy.</p>	Noted.

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		Policy S&GS 2: Prioritising local needs in the allocation of affordable housing	
Policy text	K1	<p>Policy S&GS 2 seeks to give priority for affordable housing to those people and households with a local connection to the villages. The EDBF recognises the value of people being able to remain in their existing communities and welcomes the consideration of this topic. The background to this policy refers to evidence from housing needs assessments and data from the housing register, which identifies a significant need for affordable housing both currently and in the future.</p> <p>The draft S&GSNP does not allocate any land for residential development, does not provide any policy support for residential development to be brought forward in the future through the emerging Greater Cambridge Local Plan process. It seeks to introduce policies and designations that are clearly intended to limit development at the villages in the future. In these circumstances the identified affordable housing needs of the villages would not be met, and Policy S&GS 2 would be ineffective in addressing the affordable housing needs of everyone including those with a local connection.</p>	<p>Seeking development schemes that incorporate affordable housing to prioritise allocation to those with a connection to the plan area is one of the few options available to the S&GS NP to seek to address existing high affordable housing needs. It is not within the gift of the NP to allocate sites for development in the Cambridge Green Belt.</p>
	K1	<p>Stapleford and Great Shelford are classified as Rural Centres in the settlement hierarchy, because they are large sustainable villages, contain a variety of services and facilities, are well related to employment opportunities, and are accessible by public transport. It would be inappropriate to restrict access to new affordable housing in these villages to those with a local connection, particularly when these villages are one of the most sustainable locations for development and should contribute towards meeting district-wide affordable housing needs. It is very unlikely that South Cambridgeshire District Council would accept a local connection policy for these villages when there remains a</p>	<p>Policy S&GS 2 does not propose to restrict access to new affordable housing but instead to give prioritisation in the allocation to households with a S&GS connection.</p>

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		<p>significant need for affordable housing across the district. In addition, no other made neighbourhood plan in South Cambridgeshire includes a local connection affordable housing policy, and a consistent approach should be applied throughout the district.</p> <p>It is normal practice for major residential developments in villages within South Cambridgeshire to include a clause in the s.106 Agreement that requires a proportion of affordable dwellings to be made available to households with a local connection. This approach would be applied to future developments in Stapleford and Great Shelford.</p> <p>It is requested that Policy S&GS 2 is deleted. It is requested that, as an alternative, draft S&GSNP should include a policy that supports the allocation of land for development at the villages through the emerging Greater Cambridge Local Plan process to meet housing and affordable housing needs including for those with a local connection.</p>	
Policy text	S1	It was recommended that paragraph 3 of Policy S&GS 2 was not necessary and therefore should be removed. No changes have been made, and our advice from previous comments remains the same.	
Policy text	K8	<p>Given the plan period will have a significant crossover with the eGCLP, this policy is too restricting and does not provide sufficient flexibility. The requirement for all affordable housing within the two parishes be prioritised to households with an existing local connection is not flexible to adapt to wider affordable needs or the future growth requirements in the district/Greater Cambridgeshire area.</p> <p>Limb 1 – The use of ‘to be supported’ and ‘must’ does not meet the basic conditions. This section is overly restrictive and needs rewording.</p> <p>Limb 2 – it is not appropriate to state ‘will be given priority of allocation’ in the policy. This extends beyond the reasonable requirements of</p>	<p>Noted. The policies have been amended to narrow the circumstances when a local connection criteria will be applied to affordable housing that is delivered as part of S106 development.</p> <p>Noted but not accepted</p> <p>Noted but not accepted.</p>

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		<p>planning policies and developer obligations. It is unduly restrictive in stating 'will'. This also applies to the use of the word 'any' under 'any affordable homes' and does not meet the basic conditions.</p> <p>Limb 3 – This limb refers to 'a completed affordable dwelling' and 'within a reasonable time period'. The former is too prescriptive and the latter does not provide certainty for decision-taking. This limb should be deleted.</p>	Noted but not accepted.
		Policy S&GS 3: Rural exception housing	
Supporting text	S1	Paragraph 6.40 suggests that rural exception sites are all supported. Rural exception sites must be in keeping with the village size and facilities with the Housing Needs Assessment determining the size of the sites.	Paragraph 6.40 seeks to clarify support "in principle" and "subject to the criteria set out in the policy"
Supporting text Policy text	K4	It is considered that the neighbourhood plan only cites limited support for small-scale rural exception sites, whilst also detailing a 21 dwelling affordable housing scheme which was approved. With the need for affordable housing being circa 115 housing it is clear that a step change in delivery is required and it is recommended that the policy removes reference to "small-scale affordable housing schemes" and either provides a maximum figure or recognises that a larger scheme could provide a significant supply of housing and start to rebalance both the housing and population/age mix of Stapleford and Great Shelford.	Small scale is the correct term given the definition of rural exception sites set out in the NPPF 2023. Supporting text to policy to be amended to provide further clarity on what this means in practice.
Policy text	K1	<p>Policy S&GS 3 seeks to introduce a local rural exceptions housing policy. Policy H/11 of the adopted South Cambridgeshire Local Plan already provides a district-wide rural exceptions affordable housing policy.</p> <p>Paragraph 16(f) of the NPPF states that plans, including neighbourhood plans, should "serve a clear purpose, avoiding unnecessary duplication of</p>	Not accepted. The S&GS NP has an important role in highlighting support at the local level for rural exceptions sites where they help to address S&GS needs. There are few options available

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		<i>policies that apply to a particular area (including policies in this Framework, where relevant)”. It is not necessary for Policy S&GS 3 to duplicate adopted development plan policy, and so it should be deleted.</i>	to the S&GS NP to address high affordable housing needs and this is one of the few tools it has
Policy text	S1	It is important to ensure that this policy conforms with paragraph 73 of the NPPF which now also talks about Community Led Housing on Rural Exception Sites.	The policy and plan as a whole would not itself prevent community led housing, as defined in paragraph 73 of the NPPF 2023 from coming forwards
Policy text	S1	The policy details support for small-scale rural exception sites, but what about large ones, including upwards of 11 dwellings? Policy H/11 of the SCDC Local Plan may support large scale rural exception sites so it is recommended that justification is provided for why it is just small-scale.	Noted. Further clarification provided in supporting text
Policy text	S1	It is recommended that part d) of S&GS 3 that states ‘take every available opportunity to provide sustainable routes’ is clarified. What is the expectation of this requirement? Is it reasonable to require a report which details specifically why this is not achievable on site. Is it also reasonable for all rural exception sites?	This policy criteria needs to be considered in light of the place-specific-context in the plan area. The two villages are located in reasonably close distinct to the City of Cambridge and the A1301, which cuts through the two villages, is a key route serving Cambridge. The plan area suffers from a great deal of traffic congestion and this has adverse implications on health and amenity of resident and the street scenes. The plan area benefits from having a network of active travel routes, thereby giving choice to residents. It is however imperative that all new development is part of the solution and not part of the problem. A

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			change is proposed so that the requirement is to “take every available opportunity to <u>provide or link up with existing sustainable routes</u> into either of the two villages and the City of Cambridge.
Policy text	K8	Limb a includes the text ‘are confined to’. This is overtly negative and restrictive and does not meet the basic conditions.	Not accepted. For rural exception sites it is important the affordable housing is targeted at addressing the identified needs
		Policy S&GS 4: Meeting the needs of the older population	
Supporting text	S1	Whilst the need for specialist housing for the elderly is appreciated, it is important to consider that the villages could become saturated with this type of housing, especially as there is a need for homes for the younger generation. The balance between both provisions may need more consideration	The two parish councils are also concerned that the plan area may become saturated with this type of housing and agrees there needs to be a balance. Policy S&GS 4 is only supportive of older persons housing if it is located inside the development framework. The supporting text and policy has been amended to reflect the intention of the policy more accurately.
Policy text	K1	Policy S&GS 4 seeks to meet the housing needs of older people. The supporting text to Policy S&GS 4 identifies a need for this type of housing. It is considered that there are limited opportunities for this type of housing within the settlement boundaries of the villages, and any sites that do become available are likely to be more attractive for developments providing market and affordable housing or other uses.	The supporting text to the policy explains how existing and projected need for housing suitable for older people is met through existing sites and existing housing. The policy supports additional provision subject to

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		<p>The fact that developments involving housing for older people have been permitted outside the settlement boundaries of the villages and in the Green Belt indicates that suitable sites are not available within the village boundaries.</p> <p>It is suggested that the housing needs of older people is most likely to be addressed by specific allocations for this type of housing. However, as set out in this response, draft S&GSNP does not allocate any land for development and does not provide any policy support for development to be brought forward in the future through the emerging Greater Cambridge Local Plan process, which indicates that the identified housing needs of older people would not be met.</p>	<p>criteria and only where the scheme is located within the development framework. Stapleford and Great Shelford related needs are unlikely to be met through schemes that are located in remote locations and targeted at the luxurious end of older persons housing market.</p>
		<p>Policy S&GS 5: Residential annexes to facilitate multi-generational living</p>	
Supporting paragraphs	S1	<p>Informal comments highlighted that clarification was needed in paragraph 6.54 regarding removal of Permitted Development (PD) rights from existing dwellings, and recommended to re-consider the approach set out as it would be unlikely to work in practice. The policy has been amended to include the wording '(inappropriate over-development of a site)', but this still does not clarify what 'inappropriate over-development' is, and therefore the approach is still impracticable. PD rights can only be surrendered through conditions attached to a planning permission and therefore, our advice to clarify the policy in previous comments remains the same.</p>	<p>Following further discussions with SCDC policy amendments made and further information provided in supporting text.</p>
Supporting paragraphs	S1	<p>It was recommended that paragraph 6.55 may not be in general conformity with SCDC Local Plan policy H/16 Development of Residential Gardens as the wording merges the provision of an annexe with an existing residential curtilage. The policy has been amended to</p>	<p>Noted</p>

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		clarify that planning consent is applicable 'for a supplemental dwelling'. The policy also removes the 'period of 10 years'.	
Policy text	S1	Policy S&GS 5 has been amended to reflect recommendations from our informal comments regarding annexes and provision of evidence to demonstrate specialist needs. The policy could further ensure that all applications proposing a residential annexe should submit a statement to demonstrate who will be residing in the annexe and how a functional link between the annexe and the dwelling will remain. It is recommended that the policy includes requirement for information of who will be residing in the annexe.	Noted and accepted. Amendments made.
Policy text	S1	Part c) of Policy S&GS 5 still refers to 'supplemental dwelling' but should be re-worded to 'annex'.	Noted and accepted. Amendments made.
		Policy S&GS 6: Development and design	
Supporting paragraphs	S1	On page 43, perhaps a summary of the text and some photos of the villages' character assessment from the 'Stapleford and Great Shelford Design Guidance and Codes' could be added to give the reader confidence about the rationale for the policy.	Noted
Supporting paragraphs	S1	Within paragraph 6.67, reference is made to a pallet of materials set out in section 8, but further reference is not made.	This text sits under the sub heading "Great Shelford Conservation Area Character Appraisal 2007" and is a reference to section 8 in that document. Amendment to be made to clarify this.

Para no.	Consultee ref.	Comment	Response from Parish Councils
Supporting paragraphs	S1	The Plan does not refer to guidance on the two villages provided in the adopted South Cambs District Design Guide (DDG) SPD (2010). Neither is the DDG mentioned in the 'Stapleford and Great Shelford Design Guidance and Codes' supporting document. It is recommended that reference is made in both documents.	Noted and accepted
Policy text	S1	The policy is lengthy and can be hard to follow. It is recommended that the policy does not repeat the Design Codes, but can refer to them, for example they can be cross-referenced in the main Neighbourhood Plan text. For example, the adopted Fulbourn Neighbourhood Plan (2023), states: states "As appropriate to their scale, nature and location development proposals, including infill, extensions and housing alterations, should be of a high design quality and respond positively to the design principles and guidance set out in the Fulbourn Village Design Guide (2020)." If there is additional detail that is important to a policy that is not appropriate to include in the policy or supporting text, then that should be in an appendix such as, the list of key questions from the Design Code that is fine to be repeated in the appendix in the Neighbourhood Plan.	Noted. we have sought to reduce the length of the policy without losing the clarity with respect to policy requirements.
Policy text	S1	It is recommended that wording in strengthened to reflect what is meant by a 'design-led approach' as this could be open to interpretation.	Noted. the policy has been amended to improve clarity.
Policy text	S1	It is suggested in part h) of Policy S&GS 6 to use the word 'integrate' instead of 'incorporate', to read: 'the built form should seek to integrate the surrounding landscape character...'.	Noted. Wording amended using the term "fit comfortably with".
Policy text	S1	It is recommended that Map 3 is amended so that the colours are more legible as the pink and orange are similar in shade. We welcome the opportunity to discuss map amendments and offer our support in	Noted and accepted.

Para no.	Consultee ref.	Comment	Response from Parish Councils
		recreating policy maps in order to improve the legibility of the maps, ahead of the Regulation 16 consultation.	
Policy text	K8	The detailed policy drafting can be improved to make sure it is not unduly restrictive. Limb 1b (building plots and layouts) does not account for different sectors of the housing market where specialist products may be required or the opportunities of specific sites in achieving high quality design. The stringent requirements of building 'enclosure ratios' by specific character area is overly prescriptive. For example, it may not accord with the Highway Authority requirements for street design.	Policy wording amended to refer to fitting comfortably with rather than being consistent with.
Policy text	K8	Similarly, the specific design coding for limb 1c (building height and roofline) is also overly prescriptive. Given that the S&GS NP does not allocate any sites for housing but permits affordable housing schemes or retirement housing/specialist schemes as exceptions, these characters may not be appropriate or relevant to meet identified needs. The overarching design policies in the 2018 Local Plan could be supplemented by locally derived design criteria as guidance, not a policy requirement.	Noted but not accepted. This is also a misinterpretation of what the S&GS NP does. In terms of directing the location of development, the principle of development inside the development frameworks is established through the Local Plan. The S&GS NP, does however support Rural Exceptions Housing adjacent to the development framework. It is entirely appropriate for a NP to include design policies to apply to all development that comes forward in a plan area.
Policy text	K8	The principle of Limb h (settlement edge proposals) is supported but the policy is difficult to interpret where it requires the surrounding landscape character to be incorporated. This is not clear for decision-makers when applying this policy. Reference to a soft and natural edge is relevant and this section should achieve the objectives.	Noted. The wording has been amended.

Para no.	Consultee ref.	Comment	Response from Parish Councils
Policy text	K8	Limb i (Rural Hinterland Design Principles) is confusing. The Landscape Character Assessment areas do not include a Rural Hinterland Character Area. This definition is introduced in the accompanying Design Guidance and Codes 2023 prepared by AECOM. There may need to be some further explanation included.	Agreed. The Rural Hinterland Character Area is defined on Map 3. The policy is amended to reference this map directly at this point.
Policy text	K8	Limb 2 generally repeats the requirements of existing policies in the 2018 Local Plan and NPPF guidance and may not be appropriate to include them here.	Noted but not accepted
Policy text	S13	<p>Policy S&GS 6 sets out detailed design guidelines for development within the Plan area. Points a) to g) within the Policy relate only to the 'Post-War Development', 'Historic Streets' and 'Civic Core' character areas. Points h) and i) refer to development within the settlement edge and rural hinterland, which includes land adjacent to the Biomedical Campus.</p> <p>In the Design Code, the following principles would apply to the "Rural Hinterland" area (R.H.11):</p> <ul style="list-style-type: none"> a. Development in a rural setting should make use a of deep setbacks from the road to retain an open landscape character. b. Development outside of built-up areas should remain low density with an unobtrusive form to prevent urbanising features. c. Dwellings should be well-screened from the road using hedges or mature trees. d. Development should have an informal layout to retain a sense of rural character, therefore building lines, setbacks, and built gaps should have slight variations. 	<p>Noted. It is agreed the land covered by South Cambridgeshire's 2018 Local Plan allocation E/2: Cambridge Biomedical Campus Extension should be removed from the land identified as the Rural Hinterland. It is also accepted that this site should come forward in line with the E/2 policy requirements. This includes "<i>Have building heights which are no higher than those on the adjoining parts of Cambridge Biomedical Campus and which provide a suitable transition in reflection of the site's edge of settlement location</i>".</p> <p>It is also agreed that any development coming forward adjacent to the City of Cambridge should be informed by development already in the area. However, it is also important that development at the settlement edge is</p>

Para no.	Consultee ref.	Comment	Response from Parish Councils
		<p>e. Boundary treatments should consist if natural elements such as vegetation and green hedges, wooden fencing and low stone walls may also be appropriate.</p> <p>f. Development should retain a sense of transition between the built area and the surrounding countryside through the use of planted gardens.</p> <p>g. Residential development in this character area should be of a high architectural merit and have no negative impact on surrounding landscape setting or views.</p> <p>This Policy may be considered appropriate for development on the edge of the village, but should not be applied to development on the edge of Cambridge. Clearly any expansion of the Biomedical Campus, whether solely employment or mixed-use, would be of a very different character and would seek to relate more to Cambridge Fringe.</p> <p>Greater Cambridge's Preferred Options document set out new development at the Biomedical Campus should be accompanied by comprehensive landscaping, and design parameters on height and scale, ensuring it is integrated with the existing campus. This would clearly conflict with Policy S&GS 6.</p> <p>It is requested that Policy S&GS 6 be modified to add that development considered to form part of Cambridge Fringe / the Biomedical Campus would not be assessed against the Design Code. Any development on the northern edge of the S&GSNP Area should reflect the design standards of the Campus, as has been suggested in the Preferred Options document</p>	<p>designed so as to provide a suitable transition with respect to the wider countryside. In the event of further development coming forward in the S&GS plan area but through strategic allocations in the eGCLP should accord with design specifications set out in that plan. Regardless of location, all proposals should protect or enhance Stapleford and Great Shelfords landscape character as set out in Policy S&GS 11. This includes incorporating landscape mitigation measures where required to protect and enhance the landscape setting of the two villages.</p>
		<p>Policy S&GS 7: Mitigating and adapting to climate change through building design</p>	

Para no.	Consultee ref.	Comment	Response from Parish Councils
General	S11	The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea. Additionally, parts of the area have the highest rate of housing growth in England.	Noted
General	S11	Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. Anglian Water has produced a specific guidance note on the preparation of NPs found using this link under our Strategic Growth and Infrastructure webpage - Strategic Growth and Infrastructure (anglianwater.co.uk). The guidance also has sign posting/ links to obtaining information on relevant assets and infrastructure in map form, where relevant.	Noted
Supporting text	S1	Paragraph 7.4 has been added to identify the need to provide a sustainability statement relating to energy efficiency and water use. This is in keeping with the requirements of policy CC/1 of the South Cambridgeshire Local Plan. It would be helpful if the Neighbourhood Plan could reference the use of the South Cambridgeshire Sustainability Checklist as a starting point for this Statement (appendix 1b of the Greater Cambridge Sustainable Design and Construction SPD). Is this new paragraph captured in Objective 3 of the Plan?	Noted and accepted. Amendments made. Re last sentence Yes. Objective 3 covers this
Supporting text	S1	Paragraph 7.17 relates to retrofit and encourages the use of the LETI Climate Emergency Retrofit Guide, which is welcomed. It is also recommended that reference is made to Cambridge City Council's retrofit guide for homeowners, which includes consideration of housing architypes that feature in South Cambridgeshire as well as Cambridge.	Noted and agreed. Reference has been added.

Para no.	Consultee ref.	Comment	Response from Parish Councils
Supporting text	S1	We welcome the inclusion of text related to water stress. Paragraph 7.23 the references the use of the water efficiency calculator, which research has shown can lead to higher levels of water use than the required 110 litres/person/day. As such, we would recommend that this paragraph be amended to instead encourage the use of the Fittings Approach as set out in Table 2.2 of Part G of the Building Regulations.	Noted and accepted.
Supporting text	S1	The section on adapting to climate change is welcomed. In addition to the reference to the provision of overhands on south-facing elevations, it is also recommended that external shading to west facing elevations also be included as west facing elevations can be very prone to overheating if appropriate mitigation is not provided.	Noted and accepted
Supporting text	S3	The inclusion of the South Cambridgeshire Local Plan Policy CC/7 is supported by the LLFA and is particularly important for protecting existing watercourses and groundwater bodies from pollution. South Cambridgeshire Local Plan Policy CC/8 and Policy CC/9 are also relevant as they cover the importance of managing surface water runoff in new developments using sustainable drainage systems.	Noted and accepted
Supporting text	S3	The LLFA is supportive of the promotion of water reuse via rainwater harvesting or water butts which reduces existing stresses on potable water in Cambridgeshire. Other above-ground open SuDS features could be listed such as attenuation basins, bio-retention systems, and swales as they provide water quantity, water quality, biodiversity, and amenity benefits. Permeable paving should be used as widely as possible.	Noted. But this is covered through Clauses 4 and 5 to the policy.

Para no.	Consultee ref.	Comment	Response from Parish Councils
Supporting text	S3	<p>It should also be noted that the Cambridgeshire Flood and Water Supplementary Planning Guidance (SPD) is adopted by South Cambridgeshire District Council and promotes the use of SuDS to mimic natural drainage within new developments and it is therefore great to see this mentioned within the Neighbourhood Plan.</p> <p>The Cambridgeshire County Councils Surface Water Planning Guidance also provides technical guidance for developers.</p>	<p>Noted. The following to be added to the list of reference documents after the policy box:</p> <ul style="list-style-type: none"> • Cambridgeshire Flood and Water SPD • Cambridgeshire County Council Surface Water Planning Guidance.
Supporting text	S3	<p>The LLFA would recommend that Anglian Water and the Environment Agency are consulted in relation to flood risk management, to ensure that their comments on this Neighbourhood Plan can be taken into account.</p>	<p>Agreed. Both organisations were contacted at Reg 14 stage</p>
Supporting text	S12 (LLFA)	<p>The inclusion of the South Cambridgeshire Local Plan Policy CC/7 (Water Quality) is supported by the LLFA and is particularly important for protecting existing watercourses and groundwater bodies from pollution. South Cambridgeshire Local Plan Policy CC/8 (Sustainable Drainage Systems) and Policy CC/9 (Managing Flood Risk) are also relevant as they cover the importance of managing surface water runoff in new developments using sustainable drainage systems.</p>	<p>Noted. Dealt with above against S3</p>
Supporting text	S12 (LLFA)	<p>The LLFA are pleased to see reference to Chapter 14 of the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG), and discussion of a proactive approach to mitigating and adapting to climate change, with reference to surface water flooding within the Neighbourhood Plan.</p>	<p>Noted</p>

Para no.	Consultee ref.	Comment	Response from Parish Councils
Supporting text	S12 (LLFA)	The LLFA is supportive of the promotion of water reuse via rainwater harvesting or water butts which reduces existing stresses on potable water in Cambridgeshire. Other above-ground open SuDS features could be listed such as attenuation basins, bio-retention systems, and swales as they provide water quantity, water quality, biodiversity, and amenity benefits. Permeable paving should be used as widely as possible.	Noted. Dealt with above against S3 as this is a duplicate comment.
Supporting text	S12 (LLFA)	The reference to different flood zones is particularly important since parts of Great Shelford and Stapleford lie within Flood Zones 2 and 3. The inclusion of a map showing these flood zones may be useful. Some areas of Great Shelford and Stapleford are at high risk of surface water flooding. Surface water flood risk maps could be utilised to show potential flood risk within Great Shelford and Stapleford, and the specific locations that are most at risk. Data is available from Find open data - data.gov.uk . Further information of flood risk can be found here: Check the long term flood risk for an area in England - GOV.UK (www.gov.uk) .	Noted and agreed to include maps
Supporting text	S12 (LLFA)	It should also be noted that the Cambridgeshire Flood and Water Supplementary Planning Guidance (SPD) is adopted by South Cambridgeshire District Council and promotes the use of SuDS to mimic natural drainage within new developments and it is therefore great to see this mentioned within the Neighbourhood Plan.	Noted. Dealt with above against S3 as this is a duplicate comment.
Supporting text	S12 (LLFA)	The Cambridgeshire County Councils Surface Water Planning Guidance also provides technical guidance for developers. The LLFA would recommend that Anglian Water and the Environment Agency are consulted in relation to flood risk management, to ensure	Noted. Dealt with above against S3 as this is a duplicate comment.

Para no.	Consultee ref.	Comment	Response from Parish Councils
		that their comments on this Neighbourhood Plan can be taken into account.	
Supporting text	S12 (CCES)	<p>The reference made in the Neighbourhood Plan to the Net Zero Carbon Toolkit is supported and its application by developers in making planning applications should be encouraged.</p> <p>The specific reference to heat pumps is welcomed as they are a great form of low carbon heating. Similarly the reference to the energy hierarchy, renewables and energy efficiency measures are supported.</p> <p>Great to see a thorough consideration of climate change adaptation and inclusion within the body of Policy S&SG7.</p>	Noted
Para 7.28	S3	The LLFA are pleased to see reference to Chapter 14 of the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG), and discussion of a proactive approach to mitigating and adapting to climate change, with reference to surface water flooding within the Neighbourhood Plan.	Noted
Para 7.28	S3	<p>The reference to different flood zones is particularly important since parts of Great Shelford and Stapleford lie within Flood Zones 2 and 3. The inclusion of a map showing these flood zones may be useful.</p> <p>Some areas of Great Shelford and Stapleford are at high risk of surface water flooding. Surface water flood risk maps could be utilised to show potential flood risk within Great Shelford and Stapleford, and the specific locations that are most at risk. Data is available from Find open data - data.gov.uk. Further information of flood risk can be found here: Check the long term flood risk for an area in England - GOV.UK (www.gov.uk).</p>	Noted. Dealt with above against S3 as this is a duplicate comment

Para no.	Consultee ref.	Comment	Response from Parish Councils
Supporting text (7.22-7.25?)	S11	<p>Water efficiency:</p> <p>Anglian Water is pleased to note that water efficiency is referenced within the neighbourhood plan with regard to existing Greater Cambridge Local Plan policy, as well as the emerging new draft plan. The Local Plan is expected to go further and has identified a more ambitious water efficiency standard of 80 litres per person per day, recognising that the area is seriously water stressed. Whilst Anglian Water is the statutory sewerage undertaker for the neighbourhood plan area, measures to improve water efficiency standards and include opportunities for water reuse and recycling (rainwater harvesting and greywater recycling) also reduces the volume of wastewater needed to be treated by our water recycling centres. We welcome the Policy S&GS 7 supporting a more ambitious water efficiency approach. This is also set out in the accompanying Stapleford and Great Shelford Design Guidance and Codes.</p> <p>Our revised draft water resources management plan (WRMP) for 2025-2050 identifies key challenges of population growth, climate change, and the need to protect sensitive environments by reducing abstraction. Managing the demand for water is therefore an important aspect of maintaining future supplies.</p> <p>The Defra Integrated Plan for Water supports the need to improve water efficiency and the Government's Environment Improvement Plan sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress. Given the proposed national approach to water efficiency, Anglian Water encourages this approach. This will help to reduce customer bills (including for other</p>	Noted

Para no.	Consultee ref.	Comment	Response from Parish Councils
		energy bills) as well as reduce carbon emissions in the supply and recycling of water.	
Supporting text (7.28?)	S11	<p>Flooding and Sustainable Drainage:</p> <p>Anglian Water is supportive of the measures within Policy S&GS 7 to address surface water run-off, including the preference for this to be managed using Sustainable Drainage Systems (SuDS) and requiring permeable surfaces for new areas of hardstanding within developments to align with the drainage hierarchy. This is also covered in the Design Guidance and Codes. Such measures help to avoid surface water run-off from entering our foul drainage network, and connections to a surface water sewer should only be considered where all other options are demonstrated to be impracticable. Any requirements for a surface water connection to our surface water sewer network will require the developer to fund the cost of modelling and any upgrades required to accept the flows from the development.</p> <p>Anglian Water encourages the use of nature-based solutions for SuDS wherever possible, including retrofitting SuDS to existing urban areas to enhance amenity and biodiversity within the neighbourhood plan area and contribute to green and blue infrastructure.</p> <p>It is the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024/ 2025. However, we welcome this policy to ensure SuDS measures are incorporated within new developments, until the Schedule is formally implemented and the necessary measures are in place.</p>	Noted
Policy text	S1	We welcome the level of ambition contained within policy S&GC7 and its supporting text, which is in keeping with the Council's net zero	Noted and accepted. Policy now says "in principle, supported"

Para no.	Consultee ref.	Comment	Response from Parish Councils
		carbon buildings policy in the emerging Greater Cambridge Local Plan. However, this emerging policy has yet to be subject to examination and as such has limited weight. As such, the Neighbourhood Plan can do no more than encourage developments to go beyond existing policy. Informal comments recommended that Policy S&GS 7 amended wording from 'strongly encouraged' to 'supported' to reflect that fact that this is an aspirational policy, as the Local Plan policy will be the key influential strategic policy for this area. No changes have been made to the policy wording, and our advice remains the same.	
Policy text	S1	The policy currently requires 'all development' to adhere to providing a sustainability statement. It is recommended that this is amended to be specific to the development you wish for this policy to apply to, as this is particularly onerous for householder extensions.	Amended to be consistent with supporting text. So it applies to all new buildings, dwellings and residential extensions.
Policy text	K8	This policy requires a Sustainability Statement to be submitted for all development proposals effectively all planning applications. This does not meet the national/local validation requirements for planning applications and may not be reasonable. Limb 2c seeks to control water usage. This policy is too prescriptive and may run contrary to the local water companies' advice on development proposals. The 2018 Local Plan provides sufficient policy control in this regard. We make similar comments to Limb 3. The general theme is supportable, but the prescriptive policy is unworkable in practice.	Noted. Clause 1 is amended to be consistent with paragraph 7.24. Anglian Water is supportive of the policy approach taken in the S&GS NP
		Policy S&GS 8: Renewable energy schemes in Stapleford Great Shelford	

Para no.	Consultee ref.	Comment	Response from Parish Councils
Supporting text	S1	Paragraph 7.31 is supportive of small-scale community led renewable energy proposals and makes specific reference to community wind turbines. While this approach is to be welcomed, clarity is requested as to whether it is the intention of this Neighbourhood Plan to designate areas within the parishes as being suitable for small scale onshore wind, in line with the requirements of the NPPF. It is recommended that clarification as to what a 'small-scale community led' project is made.	Whilst the supporting text to S&GS 8 includes a single community wind turbine as an example of what would be supported, the intention of the Policy S&GS 8 is not to designate the plan area as suitable for wind energy development. The relevant technical assessments have not been undertaken and would have to accompany any applicable application. The intention of Policy S&GS 8 is not to apply a blanket ban
Policy text	S1	Policy S&GG 8 does not appear to expand on the SCDC Local Plan Policy CC/2. It also requires consideration of Policy S&GS 11 wording, and creates difficulty when reading the Neighbourhood Plan policies.	The policy expands on Local Plan Policy CC/2 by requiring proposals to be compatible with Policy S&GS 11 in the NP
		Policy S&GS 9: Protecting and enhancing biodiversity and nature networks in Stapleford and Great Shelford	
General comments	S11	<p>Anglian Water supports the policy of prioritising the delivery of biodiversity net gains within the neighbourhood planning area to support habitat recovery and enhancements within existing green and blue infrastructure. Anglian Water has made a corporate commitment to deliver a biodiversity net gain of 10% against the measured losses of habitats on all AW-owned land.</p> <p>As the neighbourhood plan progresses, there may also be benefit in referencing the emerging Cambridgeshire and Peterborough Local Nature Recovery Strategy (LNRS) Local Nature Recovery Strategy -</p>	Noted and accepted.

Para no.	Consultee ref.	Comment	Response from Parish Councils
		Cambridgeshire & Peterborough Combined Authority (cambridgeshirepeterborough-ca.gov.uk) as this will identify priority actions for nature and map specific areas for improving habitats for nature recovery.	
General comments	S10	<p>Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species.</p> <p>Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.</p> <p>We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.</p> <p>Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic</p>	

Para no.	Consultee ref.	Comment	Response from Parish Councils
		Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.	
General comments	S10	<p>Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities</p> <p>Natural environment information sources</p> <p>The Magic1 website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from the Association of Local Environmental Records Centres.</p> <p>Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here2. Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.</p>	Noted and agreed
General comments	S10	<p>Wildlife habitats:</p> <p>Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here8), such as Sites of Special Scientific Interest or Ancient woodland9. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.</p>	Noted and agreed

Para no.	Consultee ref.	Comment	Response from Parish Councils
		<p>Priority and protected species:</p> <p>You'll also want to consider whether any proposals might affect priority species (listed here 10) or protected species. To help you do this, Natural England has produced advice here¹¹ to help understand the impact of particular developments on protected species.</p>	
General comments	S10	<p>Improving your natural environment:</p> <p>Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the National Planning Policy Framework. If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.</p> <p>Opportunities for environmental enhancement might include:</p> <ul style="list-style-type: none"> • Restoring a neglected hedgerow. • Creating a new pond as an attractive feature on the site. • Planting trees characteristic to the local area to make a positive contribution to the local landscape. • Using native plants in landscaping schemes for better nectar and seed sources for bees and birds. • Incorporating swift boxes or bat boxes into the design of new buildings. • Think about how lighting can be best managed to reduce impacts on wildlife. • Adding a green roof to new buildings. 	Noted and agreed

Para no.	Consultee ref.	Comment	Response from Parish Councils
		<ul style="list-style-type: none"> • Providing a new footpath through the new development to link into existing rights of way. <p>Site allocations should be supported by a baseline assessment of biodiversity value. The statutory Biodiversity Metric may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the Small Sites Metric may be used. This is a simplified version of the statutory Biodiversity Metric and is designed for use where certain criteria are met. Further information on biodiversity net gain including planning practice guidance can be found here</p> <p>You may also want to consider enhancing your local area in other ways, for example by:</p> <ul style="list-style-type: none"> • Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community. • Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's Green Infrastructure Framework sets out further information on green infrastructure standards and principles • Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance¹³). • Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency). <p>8 https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england</p> <p>9 https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</p> <p>10 https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england</p>	

Para no.	Consultee ref.	Comment	Response from Parish Councils
		<p>11 https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</p> <p>12 https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land</p> <p>13 https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space</p> <ul style="list-style-type: none"> • Planting additional street trees. • Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links. • Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore). <p>Natural England's Environmental Benefits from Nature tool may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory Biodiversity Metric and is available as a beta test version.</p>	
Supporting text	S1	Paragraph 7.39 states that 'Proposals will be considered more favourably...'. It is recommended that wording is strengthened, such as 'proposals will be supported...'. It should also be considered as to whether to policy could be split in to two, with an overarching policy containing Points 2, 3, 5 and 6 and then 1 and 4 be related to majors or larger scale schemes.	Noted. A number of changes made in response to this comment.
7.41, p60	K5	(i) page 60/section 7.41 Under Cambridge Nature Network (2021), the text reads:	Noted and agreed.

Para no.	Consultee ref.	Comment	Response from Parish Councils
		Gog Magog Hills, summarised as chalk grassland and woodlands including Wandlebury Country Park, Cherry Hinton Chalk Pit, Roman Road, Beechwoods and Magog Downs Our site is Magog Down rather than Downs.	
7.42, p61	K5	(ii) page 61/section 7.42 County Wildlife Sites -this should include Magog Down as it is a designated County Wildlife Site and this designation also covers the Stapleford Parish Pit which should be included under CWS rather than a local nature reserve.	Noted and agreed.
Policy text	S1	Whilst the principal of the policy is supported, it is recommended that the contents is re-organised to read better. For example, Point 2 should be first, with Point 3, second and Point 5 third.	The policy has been split into two with Clauses 1 and 4 in their own policy.
Policy text	S1	Part 4 of Policy S&GS 9 states, 'Proposals will be considered more favourably...'. It is recommended that wording is strengthened, such as rewording to read 'proposals will be supported...'. The policy could include how applications should provide details of how a scheme will protect and improve habitats.	The policy wording has been amended to improve clarity with respect to the intention behind the policy.
Policy text	K2	We support the reference to the Cambridge Nature Network and the inclusion of Appendix 5.	Noted
Policy text	K8	This policy needs reworking to reflect the recent changes to mandate Biodiversity Net Gain through the Environment Act.	Noted and agreed.
Policy text	K9	I note that the Objective 4 Biodiversity section of the draft Neighbourhood Plan looks at protecting green space and local areas of	Noted and accepted. Clause added to require biodiversity enhancement

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		<p>biodiversity, but except for new trees and hedgerows (which is certainly worthwhile), it does not consider endangered urban wildlife such as red-listed bird species which inhabit buildings, nor propose biodiversity enhancement integrated into new development, e.g. swift bricks, bat boxes and hedgehog highways. Such species features are excluded from the national Biodiversity Net Gain metric. In summary, therefore please add to the policy: Swift bricks to be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist. Bat boxes and hedgehog highways to also be included where appropriate.</p>	<p>measures for schemes exempt from BNG</p>
Policy text	K9	<p>In more detail, the reason for this is that bird boxes/ bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric, so require their own policy. The Government's response in March 2023 to the 2022 BNG consultation stated that: "We plan to keep species features, like bat and bird boxes, outside the scope of the biodiversity metric... [and] allow local planning authorities to consider what conditions in relation to those features may be appropriate" (page 27, https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric/). Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023). The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26). Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021)</p>	<p>Noted and accepted. Clause added to require biodiversity enhancement measures for schemes exempt from BNG</p>

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		<p>Section 8.1 Nest sites for birds, page 42: https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf). Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind. Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/)). The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November 2022) https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/ This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways." In addition to Neighbourhood Plans, many Local Authorities are including detailed swift brick requirements in their Local Plan, such as Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g. swift bricks) at a minimum of two per dwelling;" https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19), and Cotswold District Council are proposing three swift bricks per</p>	

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		dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4, https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/), so such an enhanced level should also be considered.	
Policy text	K9	Also, please add to the Neighbourhood Plan: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in the parish return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.	Noted. This is covered through Clause 1 in the revised Policy for S&GS 10. Specific mention of existing nest sites provided in supporting text.
Map 4	S1	It is recommended that Map 4 includes the names of the SSSI's that are identified on the map. Map 5 identifies the priority habitats in the Plan area but the patterns and colours are similar shades so are difficult to differentiate between. We welcome the opportunity to discuss map amendments and offer our support in recreating policy maps in order to improve the legibility of the maps, ahead of the Regulation 16 consultation.	The names of the SSSIs are listed on the map. The map is extracted from magic.gov.uk and not editable by third parties (neither should it be).
Map 5, p65	K5	(iii) page 65/Map 5: Priority habitats in the Plan area All of Magog Down is lowland calcareous grassland (except the woods), i.e. the khaki colour, but this is not shown at all on the map. Can this be corrected?	Noted. Text has been added to the supporting text to clarify this. We are unable to edit mapping layers provided through MAGIC mapping.
Map 6	S1	Map 6 shows Clay Pitt, off Granham's Road. It would be helpful to include the names of the streets to be able to identify its location.	Noted and accepted
		Policy S&GS 10: Trees and Development	

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Policy text	S1	It is recommended that links between policies 6 and 10 should be made to reinforce the importance of trees in the character of the village and to strengthen protection of trees.	Noted and agreed.
Policy text	S1	Part 1 of Policy S&GS 10 states that 'a management plan showing how trees and hedges are to be protected and sustained during the construction process'. It is recommended that this should be an arboricultural impact assessment, and a tree protection plan.	Noted and accepted
Policy text	S1	Part 2 of Policy S&GS 10 states 'Significant trees and hedgerows of good arboricultural value...', it is recommended that this is changed to 'All trees and hedgerows of high arboricultural value...'	Noted and accepted
Policy text	S1	Part 2 of Policy S&GS 10 refers to taking into account the size and condition of trees at a minimum 2:1 ratio. It is recommended including measurements in quantities, to consider replacing the canopy cover lost.	Following further discussions with SCDC for further clarity, amendment made
Policy text	S1	Part 2 of Policy S&GS 10 states 'Replacement trees should be mature saplings (3-15 years)'. It is recommended that reference to the trees size is removed.	Noted
Policy text	S1	Part 3 of Policy S&GS 10 is ambiguous where it refers to the expectation for developers will be expected to provide robust arrangements for their future maintenance. Whilst the principal is supported, it is recommended that the policy is strengthened so that developers must maintain the trees so that they establish and thrive.	Noted and accepted
Policy text	K8	Limb 1 requires certain details to be submitted as part of a planning application. This is not appropriate within a core policy, for example it is generally accepted that a future construction management plan can be	Noted but not accepted.

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		secured by a planning condition attached to a planning permission. It is not reasonable to require a management plan/tree protection plan to form part of a planning application submission for 'any' planning application where trees are present.	
		Chapter 8: Our rural setting and landscape	
General comments	S10	<p>Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities</p> <p>Natural environment information sources [...]</p> <p>National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity.</p> <p>NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here³.</p> <p>There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.</p> <p>If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.</p>	Noted and agreed.

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		General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the Magic4 website and also from the LandIS website ⁵ , which contains more information about obtaining soil data.	
General comments	S10	<p>Landscape:</p> <p>Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.</p> <p>If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.</p>	Noted and agreed.
General comments	S10	<p>Best and Most Versatile Agricultural Land:</p> <p>Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see Guide to assessing development proposals on agricultural land 12.</p>	Noted.

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General comments	S10	<p>The National Planning Policy Framework sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance⁷ sets out supporting guidance.</p> <p>Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.</p>	Noted
General comments	K6	<p>Chapter 8 of the Regulation 14 S&G SNP deals with matters relating to landscape character. We broadly support Objective 5 (Our Rural Setting and Landscape) which states that “<i>New development will actively minimise its impact on the landscape character of the Plan area, recognising the value of long views and vistas into and out of the rural setting of the villages, the open spaces within it and, critically, the separation of the villages from the expanding urbanised Greater Cambridge area.</i>” We note that this objective informs five planning policies relating to landscape matters, namely Policies S&GS 11-15.</p> <p>We have concerns regarding some of these policies. At a high level, we consider that they are unduly complicated and some of them cross-reference one another and other documents. This could be confusing. Policies S&GS 11 and 12 are particularly long and complex in their wording.</p>	Noted.
General comments	K6	<p>We would strongly encourage the Steering Group to review the five policies and consider a simpler policy approach towards landscape matters. A single policy along the lines of Objective 5 would be more appropriate. This could include supporting text which advocates for new development proposals to include landscape and visual impact assessment, where appropriate, to inform landscape mitigation.</p>	Noted.

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		<p>Reflecting on the 'basic conditions' that planning policies in neighbourhood plans are required to comply with by statute (paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004) (and as referred to in paragraph 1.8 of the Regulation 14 S&GSNP), we are of the view that the approach in Chapter 8 and Policies S&GS 11-15 is not appropriate having regard to national policy and guidance, and would not contribute to the achievement of sustainable development.</p>	
		<p>Policy S&GS 11: Protecting Stapleford and Great Shelford's landscape character</p>	
General comments	K3	<p>At Stapleford Granary, our site is part of the river Granta chalk stream ecosystem. Chalk streams are rare and fragile habitats.</p> <p>Although there is reference in the Landscape Character Assessment Report to the river Cam and less so to the river Granta (which flows into the Cam), we are surprised to see that little emphasis appears to be placed on the importance to the UK of the chalk stream ecosystem generally and its value specifically to the greater Cambridge area, to which the draft Neighbourhood Plan applies. This appears to us to be a significant omission given the likely effect of further development on water supply and water management.</p> <p>The report does note that the Granta river corridor is a County Wildlife Site and is recorded on the Priority Habitats Register. However, our site in the section of the report [i.e. the Landscape Character Assessment] relating to map J4 "Bury Farm meadows and riverside pastures" is accorded low level status although we acknowledge that the consultant</p>	<p>The importance of the habitat at Bury Farm Meadows is recognised in Policy S&GS 9: protecting and enhancing biodiversity and nature networks in Stapleford and Great Shelford. The Greater Cambridge Chalk Streams Project is referenced in paragraph 7.41.</p> <p>Paragraph 8.12 f) amended to refer to the chalk stream habitat.</p>

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		<p>producing the report may have been constrained in their ability to access the land and assess it more fully.</p> <p>Since the Landscape Character Assessment Report was produced in 2019, we are aware (and mention them here to draw your attention to them) of the publication of further reports concerning the rivers Granta and Cam chalk stream ecosystems.</p> <p>The first is the report prepared by Cambridge City Council and Cambridge Water in 2020 "Cambridge Chalk Stream Project Report". The second is a report commissioned by South Staffs Water and Cambridge Water in 2023 from APEM Ltd (Reference P00008285) which looks at potential options for restoration projects within the chalk stream landscape.</p> <p>Therefore, in relation to protecting the existing landscape, we would hope to see that the Neighbourhood Plan, as it continues to evolve, will take full account of this important landscape on the neighbourhood boundary and the impact on the chalk stream watercourses that flow through the neighbourhoods of Stapleford and Great Shelford.</p> <p>At the Association for Cultural Exchange, we have recently joined the River Granta Chalk Stream Catchment Project, led by the local Wildlife Trust. Together with other landowners along the course of the Granta, we are anticipating that this will provide a more 'joined-up', coherent and collaborative approach to protecting the chalk stream environment and its accompanying habitats. We have also embarked on a conservation project ourselves to protect and preserve the stretch of chalk stream which borders our land.</p> <p>As consultation on the Neighbourhood Plan continues, we hope that more attention will be paid to the value of the river Granta to the landscape and ecosystems in this area.</p>	

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General comments	K8	<p>The Landscape Character Assessment (2019) which has been prepared as evidence to the S&GS NP specifically looks at Parcel G1, with the whole parcel shown on the plan extract, however the 'Overall Character' is stated as follows:</p> <p><i>"Amenity grassland/pitches. The parcel of land to the south contains allotments and a practice pitch. There are some mature boundary hedgerows."</i></p> <p>Furthermore, the visual characteristics state that <i>"The two fields by the entrance behind Cambridge Road are flanked by development and visually enclosed. The remainder of the land to the rear and further north is considered to be an extension of area B1 West Shelford arable lowland."</i></p> <p>Whilst we can understand the logic of repeating the Landscape Character Assessment Plan, it is clear that the area shown as G1 covers a mixture of land types, uses, and these different characteristics should not have been included as one whole 'character area'.</p> <p>As stated in the S&GS NP research, the joint authorities Inner Green Belt Review divided area G1 into two distinct areas, with sub area 8.1 covering all of the area apart from the two fields at the entrance to the wider area (GTSA land) which formed area 8.2. Area 8.2 was considered to provide a minimal contribution to the performance of the Green Belt and development in this location could be achieved without harm to the Green Belt if done under certain parameters.</p> <p>Given the findings of the previous landscape assessment and the fact that the Landscape Character Assessment does not differ from the previous findings, nor does it provide any evidence to contradict the joint authorities assessment, the Stapleford and Great Shelford Landscape Character Assessment should also separate out G1 area with the land divided into the sports field, arable lowland and the enclosed</p>	<p>Accepted. The LCA 2019 has been amended and Map 7 in the NP updated. The extent of G1 has been corrected (reduced) and land to the north is now correctly in B1, as is the land that falls between the two fields and alongside the road that provides access to the rugby club. With regards to the latter the LCA 2019 explains that this land has a very different role with regards to contributing to Green Belt.</p>

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		farmland pastures. This has been done for sites G2 and G3 and GTSA require the same approach to be taken for G1 for consistency.	
8.12, p72	K5	<p>(i) page 72/section 8.12</p> <p><i>d) Views of the City Skyline. 15 strategic view points are identified, including View 7 (Little Trees Hill, Magog Downs), which is located in the Stapleford and Great Shelford NP area</i></p> <p>As previously, this should be Magog Down</p> <p><i>f) Habitats in the Landscape. Several designated sites of nature conservation value contribute to the landscape and Supporting Character of Cambridge. This includes three sites in Stapleford and Great Shelford: the Beechwoods LNR, the Gog Magog SSSI and Wandlebury County Wildlife Site.</i></p> <p>Given that Magog Down is also a County Wildlife Site, should the second sentence be amended to read:</p> <p>This includes four sites in Stapleford and Great Shelford: the Beechwoods LNR, the Gog Magog SSSI and the County Wildlife Sites at Wandlebury and Magog Down.</p>	Noted and accepted.
Map 7, p76	K5	<p>(ii) page 76/Map 7: <i>Landscape character areas and type. Source: Stapleford and Great Shelford LCA 2019</i></p> <p>Both Wandlebury and Magog Down are shown as Historic Country Parks (D1 and D2). While that is correct for Wandlebury, Magog Down does not have a designation as a Country Park. In our view, a better description would ideally be County Wildlife Site or possibly Nature Reserve. As this is a map from a previous report, we realise that it may not be possible to correct at this stage.</p>	Noted.

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Map 8, p77	K1	<p>EDBF objects to the following designations in draft S&GSNP:</p> <ul style="list-style-type: none"> the proposed Visually Important Open Land designation at Stapleford Allotments (as shown on Map 8 and described in Appendix 6) on the basis that this term is not defined, this land is already designated as Green Belt which is specifically about retaining openness, and the site is surrounded by dwellings and trees so it is not visible from the wider surrounding area [...] 	<p>The allotments are visible from Haverhill Road. There is also a well used permissive route going through the site. This area of Visually Important Open Land was identified initially through the 2019 LCA work. See also Paragraph 8.9 in NP.</p>
Policy text	K1	<p>DISAGREE</p> <p>Policy S&GS 11 relates to landscape character, and as part of this policy seeks to designate land as Visually Important Open Land. The land at Stapleford Allotments is designated as proposed Visually Important Open Land (part of Site Ref. 8), which is shown on Map 8 and described in Appendix 6. EDBF own the land at Stapleford Allotments. In summary, it is not necessary for land at Stapleford Allotments to be designated as Visually Important Open Land, when it is already protected as Green Belt which is specifically about retaining openness, the landscape character of the existing allotments would be protected by adopted Local Plan policies, and the land has limited visibility from the surrounding area.</p> <p>Policy S/4 of the adopted South Cambridgeshire Local Plan seeks to maintain a Green Belt around Cambridge, with any development proposals in the Green Belt assessed against national policies contained in the NPPF. The Green Belt at Great Shelford and Stapleford is defined on the Local Plan Proposals Map Inset No.45. Stapleford Allotments fall within the land designated as Green Belt. As highlighted in Paragraph 142 of the NPPF, openness is identified as an essential characteristic of the Green Belt. Policy NH/2 of the adopted South Cambridgeshire Local Plan seeks to protect and enhance landscape character, and refers to</p>	<p>There is no reason not to recognise the visual value of an area of land just because it falls within designated Green Belt. The NPPF specifies 5 possible functions that Green Belt land serve and they do not cover landscape or visual quality. The policy appropriately responds to the findings in the LCA 2019</p>

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		National Character Areas. Paragraph 16(f) of the NPPF states that plans, including neighbourhood plans, should “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)”. The proposed Visually Important Open Land designation at Stapleford Allotments would duplicate the openness requirement of the Green Belt designation that already applies to this land, and landscape character is already protected by Policy NH/2 of the adopted Local Plan. It is not necessary to duplicate development plan policies and national policies, and to do so would be inconsistent with Paragraph 16(f) of the NPPF. It is considered that, in respect of the proposed Visually Important Open Land designation at Stapleford Allotments, Policy S&GS 14 is not consistent with national policy, and as such would not meet Basic Condition (a).	
Policy text	S1	The policy contains some duplicate paragraphs. Paragraphs 1 and 3 are duplicates as well as 2 and 4.	Agreed. To be corrected
Policy text	K8	On a practical note, the first two limbs of this policy seem to have been repeated under 3.e-h and 4. We are unable to see any meaningful difference between these and the first two limbs of this policy.	Agreed. To be corrected
Policy text	S1	Part C of Point 1 in Policy S&GS 11 could be open to interpretation, therefore it is recommended that wording is changed from ‘be sympathetic to the characteristics’ to read ‘be in accordance with the characteristics’.	Noted.
Policy text	S1	It is recommended that Part B of Point 5 in Policy S&GS 11 is amended to demonstrate mitigation of harm at the planning stage that can be secured through conditions. It is suggested that wording is changed to read ‘landscape mitigation measures will be incorporated to ensure that the development is sensitively screened and assimilated into its	Agreed. To be amended

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		surroundings. For edge of settlement locations, account must be taken of important views from the countryside (see Policy S&GS 12). Robust planted buffers to site edges and edge of settlement locations are required. Mitigation measures and effects must be clearly illustrated in planning submissions.'	
Policy text	K2	The work of Cambridge PPF includes protecting and enhancing the green setting of Cambridge and we therefore support these policies [S&GS 11 & 12]	Noted
Policy text	K6	<p>Objection to Policy S&GS 11</p> <p>Draft Policy S&GS 11 proposes the designation of the Site (Greenhedge Farm) within a wider area identified as 'Visually Important Open Land' ("VIOL"). The Site sits within 'Site 8' on Map 8. The table at Appendix 6 names Site 8 as "<i>Land comprising Greenhedge Farm horse fields, allotments and Stapleford Recreation Ground</i>" and describes it as pastoral landscape with hedgerows and mature trees. It highlights that the same land is also identified as three separate LGS in S&GS Policy 14 (LGS 7, 8 and 9); it also notes important links with Views U and V (S&GS Policy 12) and the associated Important Countryside Frontages at Gog Magog Way and Haverhill Road (S&GS Policy 13).</p> <p>Policy S&GS 11 includes reference to the S&GS Landscape Character Assessment (LCA) 2019, whilst the supporting text also refers to the Greater Cambridge LCA 2021. In addition to the VIOLs in Map 8, the draft policy cross-references Map 7, Policy S&GS 12 and Policy S&GS 20 and the S&GS Landscape Improvement Area. The text under the draft policy additionally references Policy S&GS 13 and Policy S&GS 21.</p>	Noted

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Policy text	K6	As drafted in the Regulation 14 document, the wording of Policy S&GS 11 appears to include sections of direct repetition (sections 3 and 4 repeat 1 and 2).	Agreed. To be corrected
Policy text	K6	<p>Fundamentally, however, we are concerned that the draft policy is unduly complicated and heavily restrictive and is written to be applied to “<i>all development proposals</i>” within the area. We object to Policy S&GS 11 on this basis. With reference to the ‘basic conditions’ that planning policies in neighbourhood plans are required to comply with, we are of the view that Policy S&GS 11 is not appropriate having regard to national policy and guidance, and would not contribute to the achievement of sustainable development.</p> <p>We specifically object to the designation of Greenhedge Farm as part of VIOL Site 8. We are concerned that such a designation would be unduly restrictive and would prevent future opportunities for well-designed development. We are of the view that, where supported by appropriate assessment and mitigation, the Site is capable of delivering sustainable development along with a range of benefits.</p> <p>As set out in our comments above, we would advocate for a simpler policy approach towards landscape matters. An appropriately worded policy could set out the key principles on this matter, requiring any proposals for development on open land to be supported by a landscape and visual impact assessment, with design to include landscape mitigation where this is necessary to make the development acceptable.</p>	Noted
Policy text	S13	Policy S&GS 11 relates to landscape character, and states that “any major and strategic development proposal resulting in the expansion of the City of Cambridge into the plan area must incorporate landscape mitigation measures to protect and enhance the landscape setting of the	Noted but not accepted

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		<p>two villages, including where applicable a significant protected strategic landscape gap.” Elsewhere it states development must “retain the existing area of separation between Stapleford and Great Shelford and the City of Cambridge.” Note 1 then adds that such a proposal would in principle not be supported by this Neighbourhood Plan and would directly conflict with the 2018 Local Plan. The text at 8.13 further clarifies that this gap should be between “Great Shelford at Trinity Farm up to the edge of the new development.”</p> <p>This note refers to development on the west side of Shelford and does not cover development at Addenbrookes, in the north of the Plan area.</p> <p>In any event, land surrounding Great Shelford and Stapleford is designed as Green Belt, which already benefits from considerable protection. One of the purposes of the Cambridge Green Belt, defined by Policy S/4 in the South Cambridgeshire Local Plan, is to “Prevent communities in the environs of Cambridge from merging into one another and with the city”. Any release of land from the Green Belt as part of Greater Cambridge’s new Local Plan would be assessed on its impact on the separation between villages.</p> <p>Reference to a “significant protected strategic landscape gap” is therefore unnecessary as it is poorly defined and would replicate existing protections set out in Green Belt policy.</p> <p>It is requested that the policy be updated to remove reference to “significant protected strategic landscape gap”.</p>	
Policy text	K10	My clients are the owners of Grange Field. We note that it is regarded as 'Visually Important Open Land'. We find this designation unexpected as the land is not visible from any public space or public right of way. It is shielded by the tree belt on the western side of the recreation ground, can only be glimpsed from Church Street and there is no right of access	The area of land can be seen through the tree trunks and below the tree canopy. It provides characterful setting to the adjacent recreation area. The

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		across the land. All other areas designated as Visually Important are either existing public spaces or are specifically noted as being highly visible to the public. We do not therefore agree with policies S&SG 11 and S&SG 14 insofar as they relate to Grange Field.	policy responds appropriately to the findings in the LCA 2019
Map 7	S1	Map 7 identifies the landscape and character areas. Does this map duplicate information provided on Map 3, or can they show similar information in a more legible way?	The maps show very different content. Map 3 shows the character areas defined in the AECOM Design Guides and Codes report. Map 7 shows the landscape character areas identified as part of the S&GS LCA 2019
Map 8	S1	It is recommended that Map 8 is accompanied by a key to show what the numbers are identifying. We welcome the opportunity to discuss map amendments and offer our support in recreating policy maps in order to improve the legibility of the maps, ahead of the Regulation 16 consultation.	Agreed. Map amendments required.
		Policy S&GS 12: Important views	
General comments	K3	<p>On the subject of protecting highly valued views, we note that the Landscape Character Assessment Report is also somewhat light in respect of valued views from the extreme southern edge of the Neighbourhood Plan boundary. There is a reference to a general lack of public access. This is where our site interacts with the Bury Farm land (where ownership remains with Corpus Christi - also part of J4 and also B5 in the report) and, to a limited extent with the land at J3.</p> <p>It is correct that there is very little public access. However, we can confirm that there are splendid views to be had from that southern edge, particularly looking east towards the Gog chalk uplands. We have</p>	Noted

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		no doubt that, in the event of public access becoming available (see below), the opening up of the views would become a much-valued public amenity.	
Policy text Views T&U	K1	<p>DISAGREE</p> <p>Policy S&GS12 identifies a number of proposed important views around the villages, which are to be maintained and enhanced as part of any development proposals. Those proposed important views are listed in Policy S&GS12, shown on Map 9, and described in Appendix 7. It is noted that the majority of land at the edge of the villages fall within a proposed important view. The land owned by EDBF off Hinton Way falls within the identified views from Stapleford Cemetery (View T) and from Gog Magog Way (View U). In summary, it is considered that proposed View T and View U are general views of the countryside only, do not contain any particularly notable landscape or topographic features, and the assessment of those views does not explain why those views are important to warrant special protection. The adopted South Cambridgeshire Local Plan already contains policies that seek to protect landscape character and policies that require high quality landscaping to be provided with development proposals, and it is not necessary to duplicate those policies in draft S&GSNP. For these reasons it is requested that proposed View T and View U are deleted.</p>	Views T and U were both identified initially in the LCA 2019, reviewed later by the steering group and included as part of engagement work in 2023. They are both highly valued by local people. View T provides long views NE across arable fields to the new countryside park between Hinton Way and Haverhill Road, and beyond to the settled hilltop estate at Fox Hill. The view contributes greatly to the tranquil setting of the cemetery. View U permits long views scanning from NW to NE, notably towards Clarks Hill in the N and a new local landmark (the aforementioned countryside park) and the settled hilltop estate at Fox Hill. It contributes to the rural setting of Stapleford village and the viewpoint sits within the Important Countryside Frontage between 41 Gog Magog Way and properties at Chalk Hill
Policy text View T&U	K1	Policy NH/2 of the adopted South Cambridgeshire Local Plan seeks to protect landscape character and the landscape of the National Character Areas. Policy HQ1 identifies the design principles for development, which includes preserve and enhancing the character of the area and responding to the site context in the wider landscape (criteria a) and	The views work undertaken for the S&GS NP is very comprehensive. The views were initially identified as part of the 2019 LCA. The views were reviewed by the NP Steering Group in

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		<p>providing high quality landscape (criteria m). Paragraph 16(f) of the NPPF states that plans, including neighbourhood plans, should “<i>serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)</i>”.</p> <p>The landscape character around the villages, and at View T and View U, is already protected by Policy NH/2, and high quality landscaping is required by Policy HQ1 of the adopted Local Plan. It is not necessary to duplicate development plan policies related to protecting landscape character, and to do so would be inconsistent with Paragraph 16(f) of the NPPF and would not meet Basic Condition (a).</p> <p>It might be helpful for the Neighbourhood Plan Group to review the Examiner’s Report for the Fulbourn Neighbourhood Plan (published April 2022), which also considered proposed locally important views for that document - see Paragraphs 7.33 to 7.35. In summary, the draft Fulbourn Neighbourhood Plan identified multiple viewpoints into and out of the village that should be protected. The Examiner concluded that those proposed viewpoints were general in nature, the importance of those views to the surrounding landscape was not explained, and the relationship between the views and the settlement was not identified. The Examiner recommended that all of the proposed locally important viewpoints be deleted. It is suggested that the outcome would be the same for the proposed important views identified in Policy S&GS12, including View T and View U.</p> <p>It is noted that no other made neighbourhood plans in South Cambridgeshire include a policy to protect identified views. A consistent approach should be applied for all neighbourhood plans within the same district.</p> <p>It is requested that the proposed important views at Stapleford Cemetery (View T) and from Gog Magog Way (View U) are deleted</p>	<p>2023 and featured as part of a community-wide engagement exercise. The views provide both landscape and visual value. Appendix 7 provides comprehensive descriptions for each view and explains the important features within each of the views. The views work in the S&GS NP is robust and supported by the LCA 2019. Furthermore, there are other made neighbourhood plans in South Cambridgeshire that include policies that protect views. West Wickham NP, Waterbeach NP are just two examples</p>

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		from Policy S&GS12 and from Map 9, and that references to these views are removed from Appendix 7.	
Policy text	K2	The work of Cambridge PPF includes protecting and enhancing the green setting of Cambridge and we therefore support these policies [S&GS 11 & 12]	Noted
Policy text Views S&T and Appendix 7	K4	<p>It should also be recognised that rural exception sites are considered as an appropriate form of development in the Green Belt. Whilst this plan has failed to identify any housing sites, despite the stated support of residents, land to the northeast of Mingle Land and north west of Gog Magog Way would provide appropriate locations for development. This is recognised by the Landscape Character Assessment which states at B3 Mingle Lane and Hinton Way that the landscape comprises “<i>arable lowland Visually contained on three sides by almost continuous housing on Mingle Lane, Hinton Way and Gog Magog Avenue and defined to the north by weak hedgerows and the rising ground of the chalk hills. This area is not readily visible from the village. From Hinton Way it is screened by the ridgeline and from Haverhill Road the hedgerows screen views into the area. The character of the area is very open and there are long views from one gap in the built frontage on Mingle Lane over the area towards Fox Hill and from a gap on Gog Magog Avenue. There are however, extensive views from the cemetery which sits at the centre of this area in all directions. Given the poor relationship between the village and the countryside these limited public views are considered very important</i>”.</p> <p>The development of this area will represent the logical infilling of an area bordered on three sides by residential development. It will allow this area to be opened up to the wider community by allowing access and views through development. The provision of circular walks along the boundaries of the development will allow views of the wider landscape</p>	<p>It is not possible for any plan to allocate Rural Exception Sites as they are exceptions to the rule.</p> <p>Should the land between Hinton Way and Mingle Lane be allocated in the GCLP, then the policies in the S&GS NP will help ensure the development comes forward in a way that is sensitive to current surroundings. This means ensuring key features of the currently valued views S and T are preserved and ensuring the important countryside gap along Mingle Lane is respected so that the relationship between the village and wider countryside setting is retained</p>

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		<p>to be appreciated rather than glimpsed views via gaps between houses. It will also allow the landscape to be enhanced by tree planting and hedgerow enhancement to be achieved. Improving views into and out of the Neighbourhood Plan area.</p> <p>It is contended that the neighbourhood plan is being used to protect private interests and views rather than meet the wishes identified within the neighbourhood plan of the need for more affordable and smaller housing.</p>	
Policy text	S1	It is recommended that the introduction is amended to read 'Development proposals 'Development proposals must maintain or enhance the key features and the setting of the views into and out of the settlement area, listed below and shown on Map 9. Development proposals which have an impact on the views must be supported by a Landscape and Visual Impact Assessment or Landscape and visual appraisal'.	Noted and accepted
Policy text	S1	It is recommended that the policy should be significantly reduced. The policy includes a list of many views that will be onerous to assess in planning applications. Views (Aa and Bb) which are already part of the Cambridge City Council Local Plan do not need to be repeated in the Plan. It may be useful in refining the policy to review the list against existing policies and protection to see which views are likely to be affected by new development in the future.	This is not accepted. The plan area covers two parishes. The views is underpinned by the S&GS LCA 2019. This report, prepared by a landscape architect identified views that help define the character of Stapleford and Great Shelford. The S&GS NP group then re-assessed the views to confirm their validity. A number of the views are also identified in the Great Shelford Village Design Statement. It would affect the integrity of the work if views were only included in areas likely to be

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			affected by new development. Furthermore, the granting on appeal for the development of 147 homes in the Green Belt, just outside of Stapleford village is an illustration of the uncertainty with respect to where planning applications may propose development
Policy text	S1	The written descriptions of the views are also too open and may be difficult to assess them or match up in a Landscape Visual Impact Assessment (LVIA) and Landscape Visual Appraisal (LVA). Panoramic views are not used in LVIA's. The photography in the Neighbourhood Plan must meet Landscape Institute guidelines so that it provides an accurate basepoint for developers.	Noted. NP amended so that descriptions of views only appear once. The detail will be removed from the policy itself.
Policy text	K8	This policy clearly identifies the views and vistas which the Neighbourhood Plan recognises as important. Although this approach is welcomed, it would be useful to have further details of what is important about the view rather than simply a description of the view. This would help identify key features within the plan area which are most valued and ensure that these are maintained and enhanced where possible. Map 9 'Stapleford and Great Shelford Important Views', along with Appendix 7 are more than sufficient in the description and exact location of each view, and therefore Policy 12 should focus on the important aspects of each view.	Appendix 7 describes the key features of value within each view
Map 10	S1	Map 10 identifies the important views. It is recommended that the length and width of the view 'cones' are accurate, and images are provided that correspond with the views. We welcome the opportunity to discuss map amendments and offer our support in recreating policy	Noted and accepted. Amendments made

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		maps in order to improve the legibility of the maps, ahead of the Regulation 16 consultation.	
		Policy S&GS 13: Important Countryside Frontages	
Map 10	S1	Map 10 is hard to read; the areas of frontages need to be a different colour to the parish boundary line and well defined. Is the overview map for both the parishes? The Council welcome the opportunity to discuss map amendments and offer our support in recreating policy maps in order to improve the legibility of the maps, ahead of the Regulation 16 consultation.	Agreed. Map amendments required.
Map 10	K8	We do not have any specific comments in relation to this policy, it would be helpful to have a slightly clearer plan which shows both the two existing Local Plan Designations and the three proposed designations. This would just help the reader to navigate through the policies.	Agreed. Map amendments required
Para 8.21 Policy text Map 10	K4	<p>It is noted that two Important Countryside Frontages were identified in the 2018 Local Plan in Great Shelford Parish, along Cambridge Road, comprising two breaks in the built-up frontage on the western side of the road. The plan now proposes three of these in Stapleford on Mingle Lane, Gog Magog Way and Haverhill Road. The justification for their designation is weak and appears to be based on the objective of preventing access and in turn any development on the north eastern side of Stapleford.</p> <p>The Mingle Lane ICF has clearly been left as a gap to facilitate development and is not an important countryside view. Greater Cambridge Planning when assessing the suitability of the site for</p>	<p>This is not accepted. The additional proposed frontages have been identified because they meet the criteria as set out in SCDC's 2018 Local Plan.</p> <p>Should the land between Hinton Way and Mingle Lane be allocated in the GCLP, then the policies in the S&GS NP will help ensure the development comes forward in a way that is sensitive to current surroundings. This means ensuring key features of the</p>

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		<p>development did not see this view as important and also acknowledged that development of this site could improve views.</p> <p>This aspect of the Neighbourhood Plan is being used to promote less development than set out in the strategic policies for the area, or undermine those strategic policies, contrary to the objectives of paragraph 29 of the NPPF.</p> <p>The approach being taken in the neighbourhood plan also renders the majority of the plan meaningless as it will effectively curtail access to and in turn development in the most suitable part of the neighbourhood plan area for development. As a consequence, this part of the plan should be reviewed and the implications for the Neighbourhood Plan area be assessed. If the objective of the Neighbourhood Plan is to curtail the proposed Mingle Lane allocation this should be stated, rather than being hidden behind other policies.</p>	<p>currently valued views S and T are preserved and ensuring the important countryside gap along Mingle Lane is respected so that the relationship between the village and wider countryside setting is retained.</p>
Policy	S1	<p>Consideration should be taken for The Mingle Lane frontage designation as this may be contradictory with the site allocation proposed in the emerging Greater Cambridge Local Plan (S/RSC/HW Land between Hinton Way and Mingle Lane, Great Shelford).</p>	<p>The S&GS NP will help ensure the development comes forward in a way that is sensitive to current surroundings. This means that key features of the currently valued views S and T are preserved and that the important countryside gap along Mingle Lane is respected in the design and layout of any new development so that the relationship between the village and wider countryside setting is retained.</p>

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		Policy S&GS 14: Local Green Spaces and Protected Village Amenity Areas	
General comments	S2	It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy	Noted
General comments	S11	<p>Anglian Water has assets forming part of our water recycling network (rising mains and sewers) which appear to be located with some of the areas designated as Local Green Spaces under Policy S&GS 14. For example, within areas LGS1, LGS2 and LGS3. Maps of Anglian Water's assets detailing the location of our water and water recycling infrastructure (including both underground assets and aboveground assets such as pumping stations, water treatment and water works and water recycling centres) are available at: www.utilities.digdat.co.uk.</p> <p>The policy currently states that development proposals on these sites will only be supported in very special circumstances. It should be made more explicit within the policy/ supporting text that development will be managed in these areas as set out in the NPPF, in order to provide the policy basis for decision-making.</p> <p>Whilst we do not consider that any operational works or enhancements to our assets should be prevented by this policy, it would be helpful if it was clarified that this relates to national policy on the Green Belt as set out in the NPPF (2023), as operational works are permitted to be undertaken to ensure our network is maintained.</p>	Noted and accepted.

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Supporting text	S1	Image 6 of Clerk's Piece, Stapleford is hard to read, therefore it is recommended that the image quality is improved.	Noted and accepted.
Policy text	S1	The principal of the policy is supported, but it is recommended to check the status of privately owned land (LGS 2: Grange Field, Great Shelford) to make sure it is possible to prevent development on privately owned land through this policy.	Privately owned land can be designated as Local Green Space so long as the basic conditions are met
LGS 2: Grange Field	K10	My clients are the owners of Grange Field. We note that it is regarded as 'Visually Important Open Land'. We find this designation unexpected as the land is not visible from any public space or public right of way. It is shielded by the tree belt on the western side of the recreation ground, can only be glimpsed from Church Street and there is no right of access across the land. All other areas designated as Visually Important are either existing public spaces or are specifically noted as being highly visible to the public. We do not therefore agree with policies S&SG 11 and S&SG 14 insofar as they relate to Grange Field.	LGS 2 (Grange Field) has been removed as a proposed LGS.
LGS 4: Horse pasture bounded by Granhams Road, the DNA path and Macaulay Avenue	K7	The draft plan designates nine new sites in the Plan as Local Green Spaces (LGS). 'LGS 4. Horse pasture bounded by Granhams Road, the DNA path and Macaulay Avenue housing, Great Shelford' is under the College's ownership. This land was identified as a Protected Village Amenity Area (PVAA) within the January 2024 engagement. The College are supportive of the removal of this designations for the reasons set out in those representations, and welcome this having been done. However, the Draft Neighbourhood Plan now allocates this land as Local Green Space. We support the Councils in seeking to identify land that is demonstrably special as LGS. St John's College wishes though to express	Noted but not accepted.

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		an OBJECTION to the allocation of this land as a Local Green Space.	
LGS 4	K7	<p>St John's College agrees that LGS4 is:</p> <p>a) in reasonably close proximity to the community it serves; and</p> <p>c) local in character and is not an extensive tract of land"</p> <p>but disagrees that it is:</p> <p>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.</p>	Noted
LGS 4	K7	A review of the wording used in the Councils' own Open Spaces Assessment (table 1), in relation to 'Is it demonstrably special to a local community and does it hold a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?' supports this view. The test in the NPPF is that proposed LGS should be 'demonstrably special'.	Noted
LGS 4	K7	As shown within Table 1 below, the wording used by the Councils in regard to LGS 4 (and LGS 5) is clearly different to the wording, and importance, of the land subject of the other proposed LGS designations, and certainly does not state that they are 'demonstrably special'. LGS 4 is described as being 'of value' and LGS 5 as 'a popular area', whilst others are described as 'demonstrably special' (LGS 2, 6 and 7); 'very important or important' (LGS 1, 2, 6 and 9); and 'contributes greatly' (LGS 1). It is the College's clear contention that the Councils' own wording used to describe the importance of LGS 4 ('of value'), does not	Noted

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		meet the strict test identified within NPPF Paragraph 106 ('of demonstrably special').	
LGS 4	K7	With reference to the Fulbourn Neighbourhood Plan Examiners Report (September 2022), also within South Cambridgeshire and attached as Appendix C, the Examiner recommended that some draft allocated LGS were not allocated where he failed to see justification for the additional local benefit of designated land as LGS beyond its existing designation as Green Belt and where he saw nothing within the site which was inherently of such overwhelming importance (our underlining) to the local community to justify its designation as LGS (paragraphs 7.62-7.65). The identification of LGS4 as being 'of value' does not demonstrate it is of overwhelming importance. Planning Practice Guidance (PPG) states "If land is already protected by Green Belt policy, or in London, policy on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space. One potential benefit in areas where protection from development is the norm (eg villages included in the green belt) but where there could be exceptions is that the Local Green Space designation could help to identify areas that are of particular importance to the local community." (Paragraph: 010 Reference ID: 37-010-20140306, Revision date: 06/03/2014). In this context, there is no additional local benefit gained by designation of LGS 4 as Local Green Space.	Please refer to the open spaces assessment provided alongside the Regulation 14 NP and submitted alongside this NP. Unlike other parts of the Green Belt surrounding the settlement, this land is in a prominent position; it provides visual amenity for those using the DNA path and Granhams Road.
LGS 4	K7	When referring back to the Councils' own assessment, it is clear that LGS does not meet the test identified within NPPF Paragraph 106 'of demonstrably special'. Therefore St John's College object to the draft allocation of 'LGS 4. Horse pasture bounded by Granhams Road, the DNA path and Macaulay Avenue housing, Great Shelford' as a Local	Noted. But not accepted.

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		<p>Green Space within the Stapleford & Great Shelford Neighbourhood Plan.</p> <p>St John's College would encourage the Parish Council to continue to engage with them to work together in defining the best use for the College's land within the Parish and its future development.</p> <p>We would very much welcome the opportunity to comment on this Plan and are keen to meet with the Parish Council to discuss further opportunities.</p>	
LGS7, p90	K6	<p>As shown by the attached Location Plan (Appendix A), the Site known as 'Land at Greenhedge Farm, Stapleford' extends to circa 4.2 hectares and is located within the northeast of Stapleford village. The Site comprises of two distinct land parcels, both of which currently comprise fields and are separated by a dwelling and agricultural buildings. The site is bound to the east by Haverhill Road, to the south by allotments, to the west by Bar Lane and to the north by Gog Magog Way. The site is effectively surrounded by existing built development in the form of residential dwellings along these road frontages and beyond the allotments. The Stapleford recreation ground is located immediately to the north east.</p> <p>There are mature trees along Gog Magog Way, Bury Road and around the recreational ground; a denser tree belt defines the boundary of the allotment to the south. A small cluster of trees also encloses Greenhedge Farm from south east to south west.</p> <p>In accordance with the adopted South Cambridgeshire Local Plan 2018 ("Local Plan 2018") and adopted Proposals Map, the Site lies outside of the village's Development Framework and within the Cambridge Green Belt. The northern part of the Site is identified as an extension to the existing recreation ground (Land east of Bar Lane, Stapleford and west of the access road to Greenhedge Farm, 1.42 ha, under Policy SC/1).</p>	Noted.

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		The Site is not located in a Conservation Area and is within Flood Zone 1, so is considered to be at a low risk of flooding.	
LGS7, p90	K6	<p>Peterhouse would welcome a meeting to discuss Greenhedge Farm and the opportunity that the Site presents. At the present time, the entire Site sits under private ownership and control, with no public access. Peterhouse would be open to discussing an extension to the existing recreation on the northern portion of their Site and would also like to discuss the possibility of a limited and sensitively specified element of housing development on the southern portion.</p> <p>Sitting to the south of the existing buildings at Greenhedge Farm, the southern portion of the Site relates well to the existing settlement. Whilst well-screened by existing trees, it benefits from frontage and direct access to both Bar Lane to the west and Haverhill Road to the east. As a single landholding, it therefore has the potential to provide improved public access by foot and cycle, including through to the primary school.</p> <p>Peterhouse is keen to discuss their vision and aspirations for the Site with the Steering Group and/or Stapleford Parish Council. Whilst only considering high-level principles at this stage (Peterhouse does not have a detailed design concept or masterplan layout for the Site), we are concerned that two of the draft S&GSNP policies would be a constraint on the future development on the Site. Hence, we are setting out our formal objection at Regulation 14 stage, as below.</p>	Noted.
LGS7, p90	K6	Peterhouse would be willing to discuss opportunities to make parts of the Greenhedge Farm Site publicly accessible – potentially forming an extension to the existing recreation ground in the northern portion of the Site – if this was part of a wider development opportunity including the southern portion. This could deliver significant benefits to the	Noted

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		community, including improved public access and increased recreation space provision.	
LGS7, p90 Policy text	K6	We object to the proposed allocation of the Site as a 'Local Green Space'. We also object to the proposed designation of the Site within a wider area of 'Visually Important Open Land'.	Noted.
LGS7, p90 Policy text	K6	<p>Objection to Policy S&GS 14: Local Green Spaces & Protected Village Amenity Area</p> <p>Draft Policy S&GS 14 proposes the designation of the Site as a 'Local Green Space' ("LGS"). The Site is identified as "LGS 7: Horse pasture surrounding Greenhedge Farm, Stapleford", as shown by Map 11.</p> <p>We note that a total of nine sites are identified on Map 11 for proposed designation as LGS. In addition to the Site (LGS 7), this includes land to the immediate south (the allotments) as LGS 8 and the existing Stapleford Recreation Ground to the east as LGS 9.</p> <p>As referenced in supporting text to the draft policy, the NPPF allows for the designation of land as LGS. This is set out in Paragraphs 105-107 of the NPPF (as updated, December 2023), which falls under a section entitled "Open space and recreation" within Chapter 8, "Promoting healthy and safe communities".</p> <p>We note that the nine proposed LGS sites have been assessed in the S&GS Open Spaces Assessment against the three criteria set out in paragraph 106 of the NPPF (as updated, December 2023) (emphasis added):</p> <p>"106. The Local Green Space designation should only be used where the green space is:</p>	Noted but we do not agree that LGS 7 is an extensive tract of land. The land meets the criteria for LGS designation

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		<p><i>a) in reasonably close proximity to the community it serves;</i></p> <p><i>b) demonstrably special to a local community and holds a particular local significance,</i></p> <p><i>for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i></p> <p><i>c) local in character and is not an extensive tract of land.</i></p> <p>With specific reference to LGS 7, we agree that the Site is in reasonably close proximity. We note that the Site is indeed fully under private ownership, currently with no public access at all for either walking or recreational use (either formal or informal). There is no permission footpath or any similar arrangement.</p> <p>Hence, any community benefit arising from the Site at the present time is purely terms of in landscape / visual aesthetic. We disagree with the assessment in respect of the third criterion, as we consider that the proposed designation covers an extensive tract of land – especially when taking account of the proposed designation of LGS 8 and LGS 9, immediately adjacent.</p> <p>Regarding the NPPF, Paragraph 105 provides helpful context, advocating for a balanced approach when considering whether or not land should be designated as LGS. Contrary to national policy, we consider that Draft Policy S&GS 14 could have the effect of prohibiting sustainable development in S&GS:</p> <p><i>“105. ...Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.”</i></p> <p>We would highlight that additional guidance is also set out in national Planning Practice Guidance (“PPG”) (<i>Open Space, Sports and Recreation</i></p>	

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		<p><i>Facilities, Public Rights of Way and Local Green Space, 2014).</i> With respect to NPPG, we would note several relevant sections of when reviewing the sites and considering whether or not a LGS designation is appropriate:</p> <ul style="list-style-type: none"> ● PPG Paragraph 007 <i>“How does Local Green Space designation relate to development?”</i> states: <i>“Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.”</i> ● PPG Paragraph 010 <i>“What if land is already protected by Green Belt...?”</i> states: <i>“If land is already protected by Green Belt policy, or in London, policy on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space...”</i> ● PPG Paragraph 013 <i>“What types of green area can be identified as Local Green Space?”</i> states: <i>“...Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.”</i> ● PPG Paragraph 015 <i>“How big can a Local Green Space be?”</i> states: <i>“...the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.”</i> 	

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		Some of the proposed sites are already protected by Green Belt. In addition, there are six Protected Village Amenity Areas (PVAAs) within the S&GS area that are already afforded development plan protection under Local Plan Policy NH/11. These existing designations should be carefully considered in reviewing the proposed LGS sites, particularly in the light of NPPG Paragraph 010.	
LGS7, p90 Policy text	K6	We would highlight that the Regulation 14 S&GSNP is inconsistent in relation to the proposed policy approach to LGS. Supporting text at paragraph 8.25 states that <i>“the designated Local Green Spaces will be safeguarded as open spaces and protected from development”</i> , whilst the draft wording under Policy S&GS 14 states that <i>“development proposals on these sites will only be supported in very special circumstances.”</i>	Noted and accepted.
LGS 8 Policy text	K1	[EDF objects to] the proposed Local Green Spaces designation at Stapleford Allotments (LGS 8) (as shown on Map 11) on the basis that the land is already designated as Green Belt and it is not necessary to duplicate policy designations that have an identical status	Whilst the protection given to the land might be similar, Green Belt designations and Local Green Space designations have different purposes. The former is set out in paragraph 143 of the NPPF and the latter set out in paragraphs 105 and 106 of the NPPF.
Policy text LGS8	K1	DISAGREE Policy S&GS 14 seeks to designate land as Local Green Space, The land at Stapleford Allotments is designated as Local Green Space (Ref. LGS 8), which is shown on Map 11 and described in Paragraph 8.24. EDBF own the land at Stapleford Allotments. In summary, it is not necessary for land at Stapleford Allotments to be designated as Local Green Space when they are already protected by Green Belt, and to do so would	Whilst the protection given to the land might be similar, Green Belt designations and Local Green Space designations have different purposes. The former is set out in paragraph 143 of the NPPF and the latter set out in paragraphs 105 and 106 of the NPPF

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		<p>duplicate policies that already apply to the land and would be inconsistent with national policy.</p> <p>Policy S/4 of the adopted South Cambridgeshire Local Plan seeks to maintain a Green Belt around Cambridge, with any development proposals in the Green Belt assessed against national policies contained in the NPPF. The Green Belt at Great Shelford and Stapleford is defined on the Local Plan Proposals Map Inset No.45. Stapleford Allotments fall within the land designated as Green Belt. It is noted that the emerging Greater Cambridge Local Plan does not seek to change the Green Belt status of the land at Stapleford Allotments. Section 13 of the NPPF sets out national Green Belt policy, including the purposes, when boundaries can be amended, the exceptional circumstances required to amend boundaries, and the types of development that are not inappropriate. The adopted Local Plan and the NPPF already provide strong protection from development for land located within the Green Belt, including the land at Stapleford Allotments. In addition, Policy SC/8 of the adopted Local Plan also seeks to protect existing allotments and to prevent their loss to other uses.</p> <p>Paragraphs 105 to 107 of the NPPF explain the approach to designating land as Local Green Space. It is clear from Paragraph 107 that the development policies that would apply to land designated as Local Green Space should be identical to those that apply to land within the Green Belt. It is not necessary for land at Stapleford Allotments to be designated as both Local Green Space and Green Belt if the policies that apply to that land would be identical under both designations.</p> <p>Paragraph 16(f) of the NPPF states that plans, including neighbourhood plans, should “<i>serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)</i>”. It is considered that designating Stapleford Allotments as Local Green Space in Policy S&GS 14 would duplicate the Green Belt</p>	

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		<p>designation and policies contained in the adopted South Cambridgeshire Local Plan and the policies in the NPPF that already apply to this land. It is not necessary for Policy S&GS 14 to duplicate adopted Local Plan policies or national policy, and to do so would be inconsistent with Paragraph 16(f) of the NPPF. It is considered that Policy S&GS 14 is inconsistent with national policy, and as such would not meet Basic Condition (a).</p> <p>It might be helpful for the Neighbourhood Plan Group to review the Examiner's Report for the Waterbeach Neighbourhood Plan (published August 2021), which considered proposed Local Green Space designations - see Paragraphs 6.107 to 6.116 and Recommendation 20 of the Examiner's Report. In summary, the Examiner concluded that it was not necessary for allotments located in the Green Belt to also be designated as Local Green Space because they were already adequately protected by the Green Belt designation. The Examiner recommended that the proposed Local Green Space designation of allotments was deleted from the Waterbeach Neighbourhood Plan. It is suggested that the outcome would be the same if it were decided to retain Stapleford Allotments as proposed Local Green Space in draft S&GSNP.</p> <p>It is requested that the proposed Local Green Space designation at Stapleford Allotments (Ref. LGS 8) is deleted from Policy S&GS 14 and from Map 11, and references to this proposed designation are removed from Paragraph 8.24.</p>	
Supporting text Policy text	K6	At a high level, we are concerned that the Regulation 14 S&GSNP has taken an overly extensive approach in proposing a total of nine LGS sites within the S&GS area. We are of the view that this is going above and beyond the intention of national planning policy and guidance. It is particularly pertinent to note that the Inspectors who examined the South Cambridgeshire Local Plan were concerned that the District	Noted. The spaces put forward in the submission NP meet the criteria for LGS designation, set out in the NPPF.

Para no.	Consultee ref.	Comment	Response from Parish Councils
		<p>Council's assessment of proposed LGS designations had not been carried out with sufficient rigor and a number of sites did not meet the requirements of the NPPF and PPG. This is set out in paragraphs 168-171 of the Inspector's Report. On a related note, a proposed allocation for extension to the Great Shelford Recreation Ground ("<i>Land at Grange Field, Church Street, Great Shelford, 2.5ha</i>", under Policy SC/1) was also deleted following the examination in public and was not allocated in the adopted Local Plan.</p> <p>A similar approach was taken in the independent examination of the neighbourhood plan for Fulbourn, where the Examiner specifically explored whether LGS designation should be given to sites already within the Green Belt. The sites were considered carefully on a case-by-case basis. Subsequently, the Examiner's Report recommended the deletion of two proposed LGS sites from the neighbourhood plan so as to not undermine Green Belt policy in accordance with Planning Practice Guidance (ID:37-010- 20140306).</p> <p>In principle, we support the identification of publicly-accessible and locally-valued open spaces as LGS. Where land accords with national policy and guidance, there is a logic to including land such as the existing Stapleford Recreation Ground. However, we are concerned that as many as nine sites have been identified for proposed allocation under the draft policy. We specifically object to the inclusion of LGS 7 and advise that a further review of all sites should be undertaken in the context of national policy and guidance on LGS matters.</p>	
Map	S1	It is recommended that Policy 11 is zoomed in, to increase legibility, and that the key is provided alongside the map, rather than overlaid onto the map.	Noted and accepted. LGS inset maps to be provided

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Map	S1	Policy 12 shows the protection village amenity areas proposed. It would be helpful to have a key alongside the map to clearly identify the existing and proposed areas.	Noted and accepted.
		Policy S&GS 15: Preserving our dark landscape	
Policy text	S1	It is recommended to include reference to current technical guidance or British standards to help strengthen this policy and define what is required. Where lighting falls is near sensitive habitat, a wildlife sensitive lighting scheme should be designed to reduce impacts on foraging and commuting bats. It is recommended that the policy reflects guidance in the Bats and Artificial Lighting at Night Guidance Note (2023). LED lighting should emit no ultraviolet light, and Luminaires equal to or less 2,700 Kelvins should be adopted (not as stated in the policy as 3,000k). Additionally, light sources should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats.	Noted and accepted. Amendments made
Policy text	S1	Is this policy relevant for all applications or just developments of particular sizes and is it sensitive to location e.g., plots on the edge of the village? It is recommended that policy wording is re-considered as it will be difficult to enforce this policy for all development within the village, particularly restrict lighting being emitted from extensions/small scale developments.	Where planning consent is required, it is reasonable to expect applicants to minimise light pollution through appropriate and sensitive external lighting
Policy text	K8	Although we welcome the careful consideration of light impact, any policies that come forward should be implementable from a development control perspective. The careful balance between public safety and light pollution needs to be considered, there may be some instances where higher light levels are necessary to encourage more sustainable modes of transport like walking and cycling.	Noted but not accepted.

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		<p>Limb 2.d of this policy is considered to be wholly unnecessary and unimplementable from a Neighbourhood Plan perspective and should therefore be excluded from the policy.</p> <p>On the whole it is considered that external lighting is better dealt with at the application stage of any development and while it could be conditioned on any planning application, Policy S&GS 15 is considered overly onerous.</p>	
		<p>Policy S&GS 16: Delivering community infrastructure priorities alongside new development</p>	
General comments	S2	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. [...]</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p>	Noted

Para no.	Consultee ref.	Comment	Response from Parish Councils
		<p data-bbox="562 284 1391 352">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</p> <p data-bbox="562 373 1491 831">Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 103 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p data-bbox="562 852 1480 1203">Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p data-bbox="562 1209 1294 1241">http://www.sportengland.org/planningtoolsandguidance</p> <p data-bbox="562 1262 1384 1359">If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p>	

Para no.	Consultee ref.	Comment	Response from Parish Councils
		<p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p>	

Para no.	Consultee ref.	Comment	Response from Parish Councils
		PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing Sport England's Active Design Guidance: https://www.sportengland.org/activedesign	
General comments Heritage	S13	<p>Policy S&GS 16 relates to the delivery of community infrastructure through planning obligations, and identifies a specific need for informal open space and play space.</p> <p>Policy TI/8 of the adopted South Cambridgeshire Local Plan seeks planning obligations from development for the delivery of necessary infrastructure. Paragraph 57 of the NPPF sets out the three tests for planning obligations. Section ID.23b of the Planning Practice Guidance provides further national guidance on planning obligations. As set out in Paragraph 16(f) of the NPPF, it is not necessary for neighbourhood plans to duplicate development plan policies or national policies, and therefore it is suggested that the first part of Policy S&GS 16 relating to planning obligations could be deleted.</p> <p>Criteria (a) of Paragraph 97 of the NPPF requires planning policies to plan positively for the provision of community facilities including open space. Policy S&GS 16 of draft S&GSNP identifies a need for informal open space and play space as a priority. However, as noted elsewhere in this response, draft S&GSNP does not provide any policy support for development that might deliver planning obligations for new community infrastructure. Policy S&GS 16 identifies community infrastructure needs, but does not explain how that infrastructure would actually be delivered without support from additional development. It is considered that Policy S&GS 16 would be ineffective at delivering community infrastructure in the absence of development or specific policy support</p>	The inclusion of a site allocation in the NP is not a pre-requisite for development coming forward. For example, the principle of development is established within the development frameworks. It is also acknowledged that development could come forward via strategic site allocations in the eGCLP ² , once it is progressed and adopted. All development will be required to contribute towards the provision of community infrastructure in line with policies in the Neighbourhood Plan (once made) and in line with the adopted Local Plan

² Currently proposed on land between Hinton Way and Mingle Lane.

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		<p>for additional development, and it is likely that the identified needs for informal open space and play space would remain undelivered which would be a negative outcome. For these reasons, Policy S&GS 16 is inconsistent with Paragraph 97(a) of the NPPF, and as such would not meet Basic Condition (a).</p> <p>It is requested that the first part of Policy S&GS 16 relating to planning obligations for community infrastructure is reviewed in order to determine whether it is necessary to duplicate adopted development plan policies and national policy for these matters. The references to identified needs for informal open space and play space should be retained in Policy S&GS 16, but it is requested that the policy includes a mechanism for the delivery of these community infrastructure items and that draft S&GSNP includes specific policies for additional development that could support the delivery of community infrastructure.</p>	
General comments	S15	<p>The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.</p> <p>Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure’s strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to</p>	Noted and agreed. Note Policy S&GS 4 ‘Meeting the needs of the older population’ now includes a specific requirement with regards to contributions towards healthcare provision. Policies TI/8 and SC/4 in the 2018 South Cambridgeshire Local Plan requires contributions towards infrastructure requirements triggered by development. This would apply to health care.

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		continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.	
Supporting text	K2	<p>This policy highlights the need for informal open space. It can be expected that residents of any new development will look to the Gog Magog hills (Wandlebury Country Park and Magog Down) to access nature for recreational and health and wellbeing purposes. Development should therefore be required to contribute towards the enhancement of existing, and provision of new green infrastructure on the Gog Magog Hills. We therefore request that the supporting text to Policy S&GS16 refers to developers making a financial contribution through a S106 Agreement, towards the improvement and expansion of natural green space on the Gog Magog Hills, and for the policy to refer, not only to informal open space, but natural green space, as a local priority.</p> <p>S106 monies have successfully been secured from developments in Queen Ediths Ward and Sawston. For some background information, I refer you to 21/03955/FUL for 280 dwellings off Babraham Road, Sawston and the report by the S106 Officer which includes the justification and the calculation for a financial contribution to offsite green infrastructure.</p>	Noted. It is agreed that access to natural green space is a priority. The policy has been amended to make this clearer. See also Policy S&GS 20: protecting and improving routes in the countryside.
Para 9.13	S12 (EPP)	Paragraph 9.13 states that “there is adequate capacity at both schools to meet pupil projections.” This is true for Stapleford as there is a forecast surplus of places once all catchment children have been allocated a place. However, there is a forecast shortfall at Great & Little Shelford, assuming they retain 30 child classes across all year group. The school is	Noted. This comment was followed up following Reg 14 consultation and the Plan has been amended to reflect this position.

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		also on a constrained site and it would be difficult to expand the school to mitigate the existing shortfall and any increase in demand because of new development.	
Paras 9.20-9.22	S15	<p>Draft Policy S&GS16 itself sets out the overarching policy for ensuring development makes a positive contribution to sustainable growth through the delivery of appropriate infrastructure in a timely manner. Health infrastructure is clearly identified in the Neighbourhood Plan as essential infrastructure, with an expectation that development proposals will make provision to meet the cost of healthcare infrastructure made necessary by the development which we support.</p> <p>Paragraphs 9.20 through to 9.22 recognise and sets out the growth in demand for healthcare facilities within the local area. Furthermore, it also provides a range of options that could address the issue of growth in demand. NHSPS supports the Parish Council's work in identifying the growth in demand as well as the need to support a range of healthcare expansion possibilities which can be enabled through S106 agreements. We recommend that the parish council continue to engage with NHSPS as well as Cambridgeshire and Peterborough ICS in the development of any further plans.</p> <p>Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be</p>	Noted.

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		emphasised that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures.	
Policy text	K1	<p>Policy S&GS 16 relates to the delivery of community infrastructure through planning obligations, and identifies a specific need for informal open space and play space.</p> <p>Policy TI/8 of the adopted South Cambridgeshire Local Plan seeks planning obligations from development for the delivery of necessary infrastructure. Paragraph 57 of the NPPF sets out the three tests for planning obligations. Section ID.23b of the Planning Practice Guidance provides further national guidance on planning obligations. As set out in Paragraph 16(f) of the NPPF, it is not necessary for neighbourhood plans to duplicate development plan policies or national policies, and therefore it is suggested that the first part of Policy S&GS 16 relating to planning obligations could be deleted.</p> <p>Criteria (a) of Paragraph 97 of the NPPF requires planning policies to plan positively for the provision of community facilities including open space. Policy S&GS 16 of draft S&G SNP identifies a need for informal open space and play space as a priority. However, as noted elsewhere in this response, draft S&G SNP does not provide any policy support for development that might deliver planning obligations for new community infrastructure. Policy S&GS 16 identifies community infrastructure needs, but does not explain how that infrastructure would actually be delivered without support from additional development. It is considered that Policy S&GS 16 would be ineffective at delivering community infrastructure in the absence of development or specific policy support for additional development, and it is likely that the identified needs for</p>	Noted but not accepted. The inclusion of a site allocation in the NP is not a pre-requisite for development coming forward. For example, the principle of development is established within the development frameworks. It is also acknowledged that development could come forward via strategic site allocations in the eGCLP ³ , once it is progressed and adopted. All development will be required to contribute towards the provision of community infrastructure in line with policies in the Neighbourhood Plan (once made) and in line with the adopted Local Plan.

³ Currently proposed on land between Hinton Way and Mingle Lane.

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		<p>informal open space and play space would remain undelivered which would be a negative outcome. For these reasons,</p> <p>Policy S&GS 16 is inconsistent with Paragraph 97(a) of the NPPF, and as such would not meet Basic Condition (a).</p> <p>It is requested that the first part of Policy S&GS 16 relating to planning obligations for community infrastructure is reviewed in order to determine whether it is necessary to duplicate adopted development plan policies and national policy for these matters. The references to identified needs for informal open space and play space should be retained in Policy S&GS 16, but it is requested that the policy includes a mechanism for the delivery of these community infrastructure items and that draft S&GSNP includes specific policies for additional development that could support the delivery of community infrastructure.</p>	
Policy text	S1	It is recommended that Part 1 of the policy should be reworded to define either 'all housing development proposals' or provide a threshold number of homes that is required for this policy, rather than 'all development proposals'. This would more appropriately reflect Policy TI/8 of the SCDC Local Plan as not all development would need to provide infrastructure priorities.	Noted. But no change required. The first paragraph is qualified and related to impacts "where it is necessary to make the development acceptable, and where directly, fairly and reasonably related in scale and kind to the development.
Policy text	S1	The 'relevant policies from South Cambridgeshire's 2018 Local Plan' supporting text is missing. It is recommended adding TI/8 and SC/4 to the list.	Noted and accepted
Policy text	S12	There is no reference to any additional housing needing to mitigate additional demand for Early Years places, particularly given the expansion of the funded entitlement. Stapleford currently has 29	Noted. Plan amendments to reflect this.

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		fifteen-hour places, with local demand forecast to be 55 places for April 2024, 47 in September 2024 and 62 in April 2025. Great & Little Shelford currently has 117 fifteen-hour places, with local demand forecast to be 187 places for April 2024, 142 in September 2024 and 195 in April 2025. As the demand for childcare places increases it will ne be necessary for mitigation to be sought.	
Policy text	K8	As identified within the supporting text to this policy, there are a number of existing services and facilities within the Neighbourhood Plan area. We welcome contributions towards infrastructure priorities when proposing new development within the neighbourhood. The district council are best suited to ensuring that any new development contributes towards delivering community infrastructure and as such we support the way that this policy has been worded.	Noted
		Policy S&GS 17: Facilitating active travel in Stapleford and Great Shelford	
General comments	K3	<p>We are following, with interest, the developing plans for the Mass Rapid Transit proposal. While we are aware that no final route has been agreed, we deplore any suggestion that the best option would be to carve out a route across prime agricultural land, as indicated in a recent MRT consultation document.</p> <p>We are, however, supportive of the need to improve public transport between Cambridge and its villages to the south. We hope this can be achieved with minimum negative impact to the existing landscape.</p> <p>For our own purposes, we keep under constant review the way in which visitors travel to our site and the environmental impact of this travel. As our reputation grows as an arts centre, we have seen a very substantial increase ni footfall. tl is not sustainable in the long term for the majority</p>	Strategic infrastructure projects such as this falls outside the remit of a Neighbourhood Plan. The NP is not the correct vehicle through which to support or not support it. However, the S&GS NP includes a range of planning policies that would influence any proposal coming forward in the plan area. The landscape policies would be of particular relevance to any proposal to bring forward strategic transport project like this.

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		<p>of visitors or travel by car. Existing public transport links are unsatisfactory, especially for audiences attending events other than during the daytime. The community open days we have presented have attracted larger than expected visitor numbers, causing parking issues in the surrounding roads. This not acceptable to us or to our immediate neighbours and such major events have been put on hold until such time as a solution can be found.</p> <p>We urge the neighbourhood planners to engage with those designing the Mass Rapid Transport system to identify a route that does not damage the landscape but could utilise existing infrastructure.</p> <p>We do not consider that the mitigations suggested for the proposed route are anywhere near sufficient to compensate for the loss of the agricultural land.</p>	
General comments	S4	We welcome the attention paid to both 'active travel' and 'recreational routes' and the implications for paths which do not prioritise motorized vehicles, but cater for walkers, leisure cyclists and equestrians.	Noted
General comments	S14	<p>The DNA path and Linton Greenway routes needs to be multiuser track not cycle-tracks. If they are not wide enough to accommodate horses, then they are not fit for purpose for cyclists. Current proposals do not meet the road user hierarchy nor the Highway Code changes.</p> <p>Also need to add the Sawston Greenway needs to be available to horse riders throughout its length – currently horses are abandoned on the side of the A1307 and over Stapleford Bridge. Again, if it is not safe enough nor wide enough for horses then its suitability for cyclists needs to be questioned.</p>	Noted. The NP recognises that the DNA path is an important active travel route, providing access from the villages into Cambridge. It notes at paragraph 10.14 that the DNA is in need of upgrading to improve its surface, lighting and wider segregation between cyclists and pedestrians.

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General comments	S14	<p>No improvements anywhere for carriage drivers – please could you add ‘remove the restrictive, out of date and discriminatory TROs on the Roman Road so that it is fit for purpose and inclusive for today’s world’. Carriage drivers are often mobility challenged in some way or it can be the horses / ponies are no longer able to support a rider on their back and therefore a new career as a driving pony enables them to have a fulfilling and productive career. Moreover, horses are carbon neutral and many more of them may be seen out and about carrying out sustainable everyday journeys either as being ridden or being driven. Local BHS Officer willing to help explain the complexity of these TRO’s and how they can be changed to reduce fears of anti social behaviour.</p>	It is not within the scope of the NP to amend existing TROs
10.8	S14	<p>10.8 ‘Active travel’ refers to journeys on foot, cycle or other ‘wheeled’ modes of active travel (e.g. mobility scooter, wheelchair, pushchair, cycle freight), although other non-motorised users may also use the network. It aims to reduce reliance on private cars, particularly for short journeys and by single passengers, and to reduce congestion and our carbon footprint.</p> <p>This statement is not correct. Active Travel in Cambridgeshire is for walking and cycling on urban surfaces such as tarmac. Equestrians are NOT INCLUDED in Active Travel, nor is anyone wanting to Ramble, jog, dog walk, cycle, ride a horse or drive a carriage on natural surfaces in the countryside. Neither the LCWIP, Active Travel England, LTN 1/20 nor the Cambs Active Travel Strategy caters for these groups.</p> <p>An NP cannot override Cambridgeshire County Council policy on this matter. CCC have failed to implement its own ROWIP which has identified the bridleway network as fragmented, disjointed and in need of improvement. The creation of restrictive shared pedestrian / cycle paths only further this failure. Previous transport projects simply</p>	Noted

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		severed rights of way and contributed to the lack of safe access for all NMU's.	
10.13, p106	K5	<p>The Magog Trust has pushed for improvements to this path for many years. We fully support its inclusion in the neighbourhood plan and also see it is a key priority to encourage active travel in the parishes.</p> <p>For information, improvement of this path was due to be supported as part of Phase 1 GCP improvements to the A1307. It was subsequently moved to Phase 2, and would only go ahead as part of the work associated with the CSET busway. It would not be wise to assume that GCP funding for this will ever appear.</p>	Noted
10.14	S14	<p>10.14 These proposals are contrary to the changes to the Highway Code and the Road User Hierarchy because they are proposed as walking and cycling routes leaving equestrians not only in the traffic flow but with the added danger of cyclists passing them on their inside. The BHS Director of Safety has stated that such schemes should never be designed. It is poor use of public funds not to include provision for the widest range of user groups. Nothing would need to be changed for on road or roadside provision other than to change the restrictive shared pedestrian / cycle blue sign to the multi user pedestrian / cycle / horse rider sign. The vast majority of horse riders are women and girls. It can therefore be considered misogynistic not to include their safety in transport provision.</p> <p>Any crossing of the Cam at Shelford, Haverhill Road provision, the existing on road provision improvements should all be delivered as multi user access to include equestrians.</p> <p>All the Greenways should be required to be delivered as multi user.</p>	Noted. But the proposals set out in paragraph 10.14 are focused on improving the active travel network. The sub-heading has been amended to correct this. The needs to improve rural routes for all non-motorised users is set out in Policy S&GS 20.

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Supporting text	S1	Supporting paragraph 10.14 makes reference to cyclists being confined to the road edge. This wording needs correcting to reflect the Highway Code Rule 72 (and rule 67 in part).	Noted and amended.
Supporting text	S1	The 'relevant policies from South Cambridgeshire's 2018 Local Plan' supporting text is missing. It is recommended adding in a list.	Noted, accepted and amended
Policy text	S1	Part 1 of Policy S&GS 17 refers to 'All development', encompassing both minor and major applications. This would be onerous if the proposal was minor e.g., a single storey rear extension. It is recommended that the policy wording is amended to specify the level or scale of development.	Noted, accepted and amended.
Policy text	S1	It is recommended that Part 2 of Policy S&GS 17 should be amended to reflect the scale of the development that would trigger the requirement. As it is written, all proposals will generate some level of movement, for example, a single storey rear extension would generate contractor movements, although temporary, under this policy the proposal would need to either improve the connectivity across the wider neighbourhood or contribute to highlighted travel links under Map 13.	Noted, but not accepted. The policy specifies proposals to take every available opportunity to improve connectivity..... With regards to contributions these would be required where they meet the tests set out in paragraph 57 of NPPF 2023.
Policy text	S1	It should be carefully considered how the policy will be implemented. The wording in Part 2 of the policy states that development proposals should improve connectivity 'through the provision of or contribution towards improved or new active travel links'. If contribution is to be sought, it should be through a S106 agreement, however, this raises questions as to whether contributions can be kept indefinitely. It may take time for planned schemes to be delivered, or it could take time to accrue enough funds to deliver a local scheme.	Noted. It is understood contributions towards specific schemes could only be sought if scheme is in pipeline. The active travel projects noted on Map 13 cover a wide range and will be applicable to different proposals at different times in the plan period.

Para no.	Consultee ref.	Comment	Response from Parish Councils
Policy text	S1	It is recommended that Part 3 of the policy should include clarification of the scale of 'development proposals'. Part 3 should also refer to other or all active travel modes, rather than just pedestrian connectivity	Noted but no change proposed. Pedestrian connectivity is key. Proposals that result in hindering this should not be supported
Policy text	S1	The policy does not include reference to public cycle parking (and maintenance facilities). It is recommended that it is considered as to whether there is already sufficient parking in the village and in key destinations. The lack of cycle parking can often be a barrier to making a journey by cycle. It is also important to consider the use of non-standard cycles (with baskets, trailers, cargo bikes and electric bikes, which traditional Sheffield stands do not always suit.	Noted. This has been considered and policy/supporting text amendments have been made.
Policy text	S4	<p>We appreciate and support the proposed path developments and enhancements proposed in the NLP. However, we would like the aspirations to be enhanced. One particular issue is the apparent acceptance of existing permissive paths, without the aim of ensuring not only their availability in future, but also of their ongoing maintenance. We would like the NLP to adopt a policy of upgrading such paths to Public Rights of Way (PRoW), safeguarding them for future generations.</p> <p>Please add a clause to GS17 to adopt all walking and cycling routes as Public Rights of Way. We note one major anomaly: the DNA path is NOT currently a public right of way. This is a nonsense! It means that at present there is no recourse through the law to require the Highways Authority to rectify potholes, overgrowth etc. The landowner can close the path – either at will, or at the termination of a particular agreement with the Highways Authority.</p>	<p>Noted. Community groups and the Parish Council can work with landowners to change permissive routes into public rights of way. Policy S&GS 20 "Protecting and improving routes into our countryside" has been amended to refer to upgrading permissive paths to PROW. The NP planning policies are restricted to influencing what happens when new development comes forward via a planning application.</p> <p>The DNA path is part of the National Cycle Route 11 but not part of Public Rights of Way network.</p>

Para no.	Consultee ref.	Comment	Response from Parish Councils
Map 13	S1	It is recommended that Map 13 is amended to be more legible by using different colours for the purple dashed and non-dashed lines. Some of the active travel links identified extend out of the parish boundaries, and others do not. It is encouraged that the approach to maps is consistent throughout the Neighbourhood Plan. We welcome the opportunity to discuss map amendments and offer our support in recreating policy maps in order to improve the legibility of the maps, ahead of the Regulation 16 consultation.	Noted. This map will be amended and improved.
		Policy S&GS 18: Managing the impacts of new development in the Plan area with respect to the movement of people and vehicles	
Supporting text	S1	The 'relevant policies from South Cambridgeshire's 2018 Local Plan' supporting text is missing. It is recommended adding in a list including Policy TI/2 .	Noted and agreed
Policy text	S1	Part 1 of Policy S&GS 18 refers to 'major development' and 'significant traffic movements'. It is recommended that the scale of the policy wording is defined. Policy TI/2 in the SCDC Local Plan defines larger development and significant transport impacts as: "Larger development includes proposals of over 20 dwellings or 0.5 hectares for residential development and over 1,000m ² or 1 hectares for other development." And "Developments with 'significant transport implications' are those: In particularly congested locations and/or generating larger numbers of trips; Where there are particular local travel problems; That will have an adverse impact on an existing, or will result in the declaration of new, Air Quality Management Area or an unacceptable adverse impact on local air quality."	Major development is defined in the NP glossary"

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Policy text	S1	Part 2 states, 'All development proposals that are likely to exacerbate existing problems relating to traffic volumes and traffic congestion'. It is recommended that this wording is re-considered as most minor developments do not cause adverse traffic impacts and any impacts would be over a brief period of time. Clarification on the scale of development should be included. The information required in relation to impact levels and mitigation measures are useful however scale of development is required as this type of information for a small-scale development would be excessive.	Not accepted. The scale will depend on the location. For this purpose, the policy lists the 5 key sensitive locations.
Policy text	S1	It is worth noting that Policy TI/2 in the SCDC Local Plan requires a proportionate response in requiring a Transport Assessment for larger/significant impact schemes and Transport Statement for lesser schemes, with integral local emission strategy. Additionally, most developments already have to prepare a Design and Access Statement.	Noted
Policy text	S1	Part 2 of S&GS 18 refers to the expectation for developers to widen streets/pavements and provision of crossing points. This will need approval of the Local Highway Authority through separate permissions.	Noted
Policy text	S1	Part 2 of S&GS 18 notes particular congestion points, including the two-level crossings. The delay, and resultant traffic congestion and safety concerns, caused by railway barrier downtime is not a planning policy matter and concerns should be taken up with Network Rail. It is therefore unclear what the policy would be seeking to achieve with respect to these two locations. The lack of a footbridge could be picked up in Policy S&GS 17.	The existing congestion around all 6 locations are planning considerations when it comes to new proposals
Policy text	S1	Part 3 of the policy is useful and a good caveat to catch all previous points made, but the scale of development should be stipulated.	Noted. If an impact is unacceptable, it is unacceptable regardless of the scale

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			of development being proposed. See para 115 NPPF 2023.
Policy text	S1	It is recommended that consideration is given to the provision of public electric vehicle charging facilities. Installing a public charger(s) in the car parks could help reduce the emissions from vehicles that use the village facilities. Similarly, has any consideration been given to introducing a car share club which may enable households not to own (and use) as many cars.	Noted and agreed. Whilst this falls outside the scope of a NP planning policy, it is a matter that could complement Policy S&GS 7 or S&GS 8 rather than S7GS 18
Policy text	S1	It is recommended that the content of the policy is carefully considered. Most of the points raised are already mitigated through the inclusion of conditions securing Traffic Management Plans and Construction Traffic Route Plans, as well as Construction Environmental Management Plans Transport Assessments are required for all major developments.	Noted. The policy is specific to S&GS NP area, helpfully drawing on existing problems and ensuring both planning applications and decision making respond appropriately. From the PCs perspective, conditions and plans are not enforced when not adhered to. In the case of SPC, a HGV routing plan was sought but not allowed for as part of the planning condition. The consequence of this is more resource demand with 2 weekly meetings with Rangeford to discuss arrangements and deliveries.
		Chapter 11: Countryside access and countryside enhancements	
General comments	K3	We strongly believe in the value of public access to outside space and educating people about the landscapes and habitats they are visiting. At Stapleford Granary this summer (from June 2024) we shall be opening up to the public our heritage orchard, which borders the chalk stream,	It is good to note compatibility between the aims of the NP and Stapleford Granary's stewardship plans for water meadows and circular walks adjoining

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		<p>with an associated education/information programme about the chalk stream habitat.</p> <p>As noted above, our site is small and on the boundaries of the Neighbourhood Plan area. We adjoin the Bury Farm arable lowland (B5). This is noted in the Landscape Character Assessment Report as being in intensive arable production for decades. However, our site also provides what we understand to be the only access into what is described in the Landscape Character Assessment Report as being 'water meadows', across the chalk stream from our site (also part of J3). Those 'water meadows' have been set aside land for c20 years, as far as we are aware, therefore not subject to any farming intervention in that period. It is also our understanding that, irrespective of their designation, they create an undisturbed habitat that forms a unique part of the chalk stream landscape.</p> <p>While the Landscape Character Assessment Report notes the decline in tranquillity of the area due to traffic noise from the A505, M11 and A11, our experience on this land is more one of the predominance of bird song.</p> <p>As part of a longer-term stewardship scheme for the 'water meadows' now that the set aside subsidies have ceased, we are in the early stages of exploring the possibility of acquiring the land with a view to managing it as a conservation/environmental education programme. We mention this here because, if we are successful in this regard, the charity would work with our conservation advisers to ensure that any future programme properly balanced the environmental value of the site with appropriate public access, education and amenity.</p> <p>We note the Neighbourhood Plan records more widely the absence of circular paths and bridleways etc throughout the area of the plan. We fully support the recommendation that improving public access involves</p>	<p>and passing through its site. To sustain this moving forward, we would encourage conservation advisers you may work with to familiarise themselves with relevant sections of the NP and potentially to also seek input from the local planning authority</p>

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		the development of circular walks etc. If, for example, we are successful in the plan touched on above, this would have potential for developing a circular walk linking with existing paths/bridleways through the chalk lowland to the Gog uplands and providing access to the views we have mentioned elsewhere in this submission.	
		Policy S&GS 19: Protecting and improving routes into our countryside	
General comments	S4	We welcome the attention paid to both 'active travel' and 'recreational routes' and the implications for paths which do not prioritise motorized vehicles, but cater for walkers, leisure cyclists and equestrians.	Noted
General comments	S4	We recognise that the primary interests of the NLP arise from and relate to the main population centres. However, paths which run close to the boundaries of the two parishes, which abut Cambridge City, as well as other South Cambridgeshire Parishes such as Hauxton, Fulbourn and Sawston, are rarely mentioned. As the NLP recognizes, the two parishes have a wealth of pleasant countryside on the doorstep, but very limited off-road access.	Noted
General comments	S4	<p>The second issue of concern is the inadequate network of paths – both public rights of way and permissive. Whilst welcoming the proposals in the NLP, we consider these to be far too limited. Wandlebury, Magog Down and Nine Wells are the 'country parks' of a huge area and resident population.</p> <p>The footpath leading to Nine Wells is a dead end – another anomaly. Nine Wells could be extended and must be linked by a PRoW to other routes.</p> <p>The Ramblers would very much welcome a link footpath along the Stapleford Parish boundary from the bridleway at the bridge over the</p>	Noted but the NP has had to prioritise with respect to aspirations and did so following a community engagement exercise in 2023. Following Regulation 14 consultation, the route suggested here (a link footpath along Stapleford parish boundary from the bridleway at the bridge over the River Granta) has been raised by a number of consultees and it, and several other off-road routes which have not yet received in

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		River Granta (grid ref 496514) north to the Magog Down perimeter footpath at grid ref 497523. This would create a new circular path for the local population. It would also provide access to Wandlebury.	principle agreement from relevant landowners, have been identified in a new appendix to the NP, such that a public record exists for future reference.
General comments	S14	No improvements anywhere for carriage drivers – please could you add ‘remove the restrictive, out of date and discriminatory TROs on the Roman Road so that it is fit for purpose and inclusive for today’s world’. Carriage drivers are often mobility challenged in some way or it can be the horses / ponies are no longer able to support a rider on their back and therefore a new career as a driving pony enables them to have a fulfilling and productive career [...] Local BHS Officer willing to help explain the complexity of these TRO’s and how they can be changed to reduce fears of anti social behaviour.	Noted. But this falls outside the scope of the NP which is limited to influencing planning applications and decisions
General comments	S14	<p>Surfacing of new provision – any proposals to create tarmac paths in the countryside should be tested against :</p> <p>‘Major development proposals will be expected to include a whole life cycle carbon emissions assessment to demonstrate actions taken to reduce embodied carbon resulting from the construction and use of the building over its lifetime.’</p> <p>The damaging effect of the construction process as well as the negative impact of sealed surfaces must be balanced against the claims for sustainable travel. Improvements for cycling can be provided without resorting to damage to the environment and biodiversity caused by tarmac. The serious impact of heat islands from sealed surfaces / tarmac should never be ignored. If a net gain cannot be demonstrated, then an alternative surface must be looked at such as hoggin. Active Travel for</p>	Noted. The supporting text to the policy will be updated to include more information on surfacing.

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		<p>commuting is not the same as non motorised users for leisure and recreation.</p> <p>'Improvements for cycling' on the Mere Way byway resulted in this environmental and human disaster. These photos are taken in the same spot. [Consultee here submitted 'before' and 'after' photos of Mere Way byway]</p> <p>Whereas in Cambourne these natural material paths have been down 15 years, are well used by horses, walkers, cyclists, dog walkers, wheel chair users and pram pushers. Much more suitable for rural application. [Consultee here submitted photo of horses on natural material path]</p>	
General comments	S14	<p>There can be no justification for creating restrictive footpaths for countryside access. They should be to restrictive byway standard by default reducing only to bridleway status to ensure the maximum number of users.</p> <p>All the paths proposed in the Plan must be to these standards otherwise there will be objections by those excluded.</p>	Noted. Supporting text has been updated to reflect this priority for new routes.
General comments	S14	<p>One route seems to have been omitted from the plan. The need for a safe off road link from Worts Causeway up to the rear of the Roman Road. This has long been an ambition of both the Ramblers and the British Horse Society. It is also on the wish list for cyclists. It is to be hoped that the opportunity to secure some funding for this significant need has not been lost in the recent planning approval for the housing off Babraham Road near Wort's Causeway. Given the additional number of residents coming to the area as a result of the housing this should have been a priority.</p>	The NP has had to prioritise. In 2023 a range of options were presented as part of community engagement. This process has informed the identified priorities.

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11.15, p119	K1	<p>Paragraph 11.15 Path on Haverhill Road between A1307 and Stapleford (shown on Map 15)</p> <p>Paragraph 11.15 of draft S&G SNP refers to a community aspiration to improve the existing path alongside Haverhill Road, between Stapleford and the A1307, in order to provide access for all non-motorised users e.g. pedestrians, cyclists, horses. EDBF own part of the land adjacent to the existing path. It is not clear from Paragraph 11.15 whether the proposed improvements to the path could be undertaken within public highway owned land. If other land is required then Paragraph 11.15 should include further details on the landownership of the required land, the width of the land required for the proposed path and associated infrastructure, and what landscaping/boundary treatments would be provided adjacent to the proposed path.</p> <p>If land owned by EDBF is required to improve the existing path alongside Haverhill Road, it is requested that this should be discussed with them in advance of the Reg.16 stage of S&G SNP.</p>	<p>It is agreed that the implications for landowners and of land ownership is of key relevance to delivery of these aspirations. The Parish Councils will continue to liaise and work with all stakeholders on these matters. In the meantime, these aspirations remain valid and it is important to articulate them through the NP. The county council owned land extends for 3metres off the road verge. There may be a need for additional land, depending on specification.</p>
11.17, p119	K1	<p>Paragraph 11.17 Drift Track SE off Haverhill Road, Stapleford (shown on Map 15)</p> <p>Paragraph 11.17 of draft S&G SNP refers to a community aspiration for a new public right of way along the drift track to the south east of Haverhill Road, and that proposed route is shown on Map 15. EDBF own the land that would be required for the north/south section of this proposed route identified in the plan below and this forms part of the agricultural field occupied by the EDBF's agricultural tenant. There is no public right of access to this north/south section. Without landowner approval this proposed new public right of way route will not be</p>	<p>Noted. It is agreed that the implications for landowners and of land ownership is of key relevance to delivery of these aspirations. The Parish Councils will continue to liaise and work with all stakeholders on these matters. In the meantime, these aspirations remain valid and it is important to articulate them through the NP.</p> <p>This route has been removed from the map and instead is shown in map in Appendix 9 and referred to as not</p>

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		<p>provided. No continued Right of Way exists where this proposed route terminates.</p> <p>The EDBF does not control the access to the east/west section of the proposed Drift Track route which has a locked gate controlled by an unknown third party. The east/west section of the Drift Track is separate from the actively farmed portion of the field and follows the route of the existing Drift Track.</p> <p>It is requested that if the proposed new public right of way along the drift track to the south east of Haverhill Road requires land owned by EDBF this should be discussed with them in advance of the Reg.16 stage of S&GSNP.</p>	agreed in principle but yet aspired to route.
11.17, p119	K5	<p>The Magog Trust wholly supports any initiatives to connect the Drift Track to Villedomer Wood. There was for many years informal access along the route proposed as there was a wide field margin used by the farmer who rents the field. However, policy changes resulting from the UK leaving the EU meant that it was no longer financially beneficial to maintain the field margin. Whether the new land management schemes that are being introduced will persuade the Diocese and/or the farmer to reinstate the field margin need to be explored.</p>	Noted.
Policy text	K1	<p>Policy S&GS 19 of draft S&GSNP seeks to protect and improve the public right of way network in order to provide routes into the countryside. The approach towards improving the public right of way network and access to the countryside would be consistent with Paragraph 104 of the NPPF. It is noted that the Stapleford & Great Shelford Landscape Character Assessment (October 2019) suggested a number of new public rights of way routes around the villages as part of</p>	Points noted. Including these aspirations clearly in a community-led plan such as the NP, is a step in the right direction in terms of seeing improvements delivered on the ground

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		<p>land management and access improvements, but the Assessment did not explain how those new routes would actually be delivered.</p> <p>There are a number of ways that new routes and connections to the public right of way network can be created. It might be possible to agree a right of access with a landowner, but this is unlikely if there would be no benefit to the landowner. A public body might allow access across its land as part of providing a benefit to the local community, but this would depend on landownership arrangements. It is more likely that new public rights of way would be agreed and delivered if there were benefits to a landowner, such as in conjunction with development. However, as noted elsewhere in this response, draft S&GSNP does not provide any policy support for development that might deliver new public right of way routes and connections.</p> <p>No changes are requested to Policy S&GS 19, but draft S&GSNP should include specific policies for additional development that could support the delivery of new public rights of way routes and connections.</p>	
Policy text	S1	Can the contents of Policy S&GS 19 be linked to Section 106 contributions?	Yes. The wording has been amended to make this even more clear.
Policy text	S1	The policy wording 'proposals...will be viewed favourably where they are otherwise acceptable', indicates that development would be viewed favourably should they comply with the Policy. This should either read 'otherwise unacceptable' or should not be worded in such a way.	Noted. Wording has been amended.
Policy text	S1	It is recommended that Part 3 should be amended to specify the size or scale of development. The policy currently indicates that any new housing scheme would have to contribute to improved public access routes into the countryside, however this would be too onerous for one	Noted. Wording has been amended.

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		dwelling and should relate to larger scale developments rather than minor developments.	
Policy text	K7	Having regard to the College's landholdings, in terms of specific policies in the Plan, we SUPPORT Policies S&GS 19 and S&GS 20:	Noted
Policy text	K7	Map 15 (Appendix A shows that the proposed Granhams Road walking route has been carried forward from the January 2024 engagement with 'important stakeholders'. Part 3 of Policy 19 states "Development schemes where additional demand is generated (i.e. new homes) will be expected to contribute (subject to Paragraph 57 of the NPPF) to the provision of improved public access routes into the open countryside, providing access from village edges for informal recreation, exercise, wildlife enjoyment and countryside relaxation." St John's College continue to show support for the inclusion of this aspiration in the Neighbourhood Plan to be funded by s106 contributions from developers, should they be granted planning permission in the future within the plan area.	Noted
Policy text	S4	Please add a clause to Policy GS19: to create Public Rights of Way on the line of existing 'permissive paths'. At present the existing, very important, permissive path network could disappear at any time. Many of the routes were established under EU legislation, when payment was made to landowners/agents/tenants to provide paths for a time-limited duration. At present, most of these routes only exist due to goodwill; they could be lost with little notice. Attempts have been made to use S106 funds from the Cambridge South developments to upgrade them to PRow, but these appear to have failed. We would identify as a priority the permissive bridleway which starts out as 'Jenny's Path' and runs on an established track through to the A10 next to Hauxton Mill. If this route was a Public Bridleway it would attract public funds to help	Noted. The policy has been amended in light of this.

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		remove the recurrent flooding issue where the path takes a subway under the railway line. We understand that Jesus College is the main (only?) landowner in this instance and hope that some way forward can guarantee the continuing existence of this route for public use.	
Map 14 and 15	S1	Map 14 requires a boundary line to be consistent with the other maps. The lines and colours are illegible and do not match those in the key, for example, the national cycle route appears to be a different colour on the map than that which indicates the routes. The map key indicates that there are bus stops but there are none shown, just the bus station. Additionally, the map is missing the potential CSET route and the new country park footpaths north of the new retirement village. Lastly, the motorway / A-roads notation is missing from several routes, including from the M11 roundabout into the city and into village. Map 15 would also benefit from using clearer colours and identifying the locations. We welcome the opportunity to discuss map amendments and offer our support in recreating policy maps in order to improve the legibility of the maps, ahead of the Regulation 16 consultation.	Noted. In follow discussions with SCDC (s1) no further amendments to the map were required
Map 14 and 15	S4	It is a pity that the NLP maps do not show existing permissive paths and the agreements, if any, which relate to their availability.	It would not be appropriate for the NP to show these as they could change.
Map 15	K5	The Magog Trust is interested in the potential to have a permissive path which runs from close to the bridge over the River Granta (Grid ref. TL 4951 5144) along the field edge and parish boundary to the corner of Vestey Wood on Magog Down (Grid Ref. TL 4967 5226). This would create an additional circular route. The path is well-used on an informal basis by numerous people. This is land owned by Corpus Christi College. Unfortunately, we think obtaining agreement may be difficult and there	Noted. These are included as potential route but not one agreed by landowners. See new appendix 9 to NP.

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		<p>is always a risk that the college may erect signs/barriers to restrict access if pushed too much.</p> <p>At one time, there was an unofficial path from the Black Barn (Grid Ref. TL 4878 5152) to the Drift Track, which ran roughly parallel to the line of the power cables. This would provide a shorter circular route from the Village and would also connect to Magog Down if the extension of the Drift Track as outlined above is implemented. There would seem to be no reason why a path could not be situated just to the side of the power cables and this would limit the loss of agricultural land.</p> <p>In our view, it would be good to see both of these on Map 15 as aspirational routes.</p>	
		<p>Policy S&GS 20: Stapleford and Great Shelford's Improved Landscape Area</p>	
<p>General comments Para 11.29</p>	<p>K3</p>	<p>Our submission in respect of this part of the consultation is to support the underlying strategic objectives of the Neighbourhood Plan to restore, enhance and protect the landscape of the area to which the plan relates, while managing appropriately the necessary further development that Greater Cambridge appears to require.</p> <p>We are pleased that the Landscape Character Assessment Report acknowledges to the extent that it does the under-stated qualities of much of the landscape of the area (despite the absence of emphasis on the chalk streams), its history and its heritage.</p> <p>We noted the reference in this part of the Neighbourhood Plan to the South Cambridgeshire Southern Fringe Action Plan in 2008. It begs the question whether the intervening period since 2008 has seen any</p>	<p>Noted</p>

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		<p>meaningful action to improve the landscape, biodiversity and public access.</p> <p>Overall, we support the recommendations made in the Landscape Character Assessment Report for the land specifically in area J4 and the proposals for ecological enhancements, a policy to identify the importance of the river corridor (although we would say that other wildlife/environmental charities/NGOs are already doing this and looking at opportunities for net biodiversity gains. We confirm that we would wish to be actively involved in furthering these recommendations.</p>	
General comments	S14	<p>Roadside planting – there has to be a caveat on this statement concerning protection of hedging from destructive weeds such as ivy, cleavers, bindweed, wild hop. No mow May etc. has to be balanced against the danger of allowing invasive weeds to thrive to the detriment of other important flora.</p> <p>The other important use of roadside verges is as safe havens for non motorised users. Planting policies should recognise the need for and incorporate provision for safe access from vehicular travel. This could be provided in the form of a mown path away from the carriageway. Safety of road users also needs to be taken into account in terms of visibility at junctions, roundabouts etc, acknowledging the fact that not all road users' line of sight is at car driver level.</p>	The reference to roadside planting refers to the bullet point under paragraph 11.23. this is one of the measures identified in the Southern Fringe Area Action Plan. However this point is relevant to Policy S&GS 19. It is agreed safety of all road users need to be taken into account. Policy amended in light of this comment.
11.23	S14	<p>11.23 Southern Fringe Area Action Plan</p> <p>At this juncture, it is pertinent to remind both Parish Councils of the Southern Fringe S.106 money for access which appears to have vanished. Both the Ramblers and the BHS fought hard to secure the funding for a number of multi user routes but they were all rejected despite having been approved during the many rounds scrutiny. Please</p>	Noted. This has been raised with the local planning authority.

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		could this Plan once again seek the answers to what has happened to the funding and make sure that once found, it is spent to benefit countryside access for all users.	
Footnote 13, p.124	S14	Not for all users [re. access to Wandlebury Country Park from Cambridge]. The use of the term 'active travel' is misleading	Noted. Footnote to be amended
Supporting text	S1	Paragraphs 11.22 and 11.24 refer to Policy CS/5. It is in the 2008 Cambridge Southern Fringe Area Action Plan rather than the Cambridge Local Plan 2018.	This is not accurate. Policy CSF/5 (2f-m) is clearly referenced on the Adopted Local Plan policies map. See Inset E South of Addenbrooke
Supporting text	S1	Paragraph 11.29 lists the identified improvements. Many of the identified improvement areas appear to fall outside of the ownership of the Parishes. Will these areas be able to be enhanced with contributions, and how will this be managed if land is outside of the red line plan/ownership of the applicant?	Policy S&GS 20 states that <i>opportunities will be sought</i> . In some situations, the opportunity to implement these improvements may not be available. But this does not negate the validity of the policy
Supporting text	S1	It is recommended that Part 2 of the policy is reworded so that contributions for the improved landscape areas can come from any development.	Noted. policy amended following further discussions with SCDC. Policy needs to be compliant with paragraph 57 of NPPF 2023
Policy text	K1	[EDF objects to] he proposed Improved Landscape Area designation (as shown on Map 16) on the basis that it is not necessary to duplicate a similar landscape improvement designation in the adopted Cambridge Southern Fringe AAP	Noted but not accepted. This issue has specific relevance to S&GS NP area and is therefore taken forward and updated as part of the NP

Para no.	Consultee ref.	Comment	Response from Parish Councils
Policy text	K1	<p>DISAGREE</p> <p>Policy S&GS 20 of draft S&GSNP seeks to designate all of the land on the eastern edge of Stapleford and Great Shelford as an Improved Landscape Area, for the purpose of countryside enhancement measures.</p> <p>The proposed Improved Landscape Area is shown on Map 16. Policy CSF/5 of the adopted Cambridge Southern Fringe AAP, which is part of the adopted development plan for South Cambridgeshire, already designates the same land for a countryside enhancement strategy. The land designated by Policy CSF/5 is shown on Inset E of the adopted AAP. Policy CSF/5 provides additional detail of the landscape, planting and access measures required. The countryside enhancement strategy proposed in the adopted AAP are linked to and funded by development. There are no development allocations in draft S&GSNP that would support the delivery of the proposed Improved Landscape Area in Policy S&GS 20. It is considered that without an effective delivery mechanism the proposed Improved Landscape Area designation would not be implemented.</p> <p>Paragraph 16(f) of the NPPF states that plans, including neighbourhood plans, should “<i>serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)</i>”. It is clear that the proposed Improved Landscape Area designation in Policy S&GS 20 duplicates Policy CSF/5 of the adopted Cambridge Southern Fringe AAP, which is not necessary. Policy S&GS 20 would be contrary to national policy, and as such would not meet Basic Condition (a).</p> <p>It is requested that the proposed Improved Landscape Area in Policy S&GS 20, and shown on Map 16, is deleted.</p>	<p>Noted but not accepted. This issue has specific relevance to S&GS NP area and is therefore taken forward and updated as part of the NP</p>

Para no.	Consultee ref.	Comment	Response from Parish Councils
Policy text	S13	<p>Policy S&GS 20 of draft S&GSNP seeks to designate all of the land on the eastern edge of Stapleford and Great Shelford as an Improved Landscape Area including an area of new Public Open Space adjacent to Ninewells, for the purpose of countryside enhancement measures. The proposed Improved Landscape Area is shown on Map 16. Policy CSF/5 of the adopted Cambridge Southern Fringe AAP, which is part of the adopted development plan for South Cambridgeshire, already designates the same land for a countryside enhancement strategy. The land designated by Policy CSF/5 is shown on Inset E of the adopted AAP. Policy CSF/5 provides additional detail of the landscape, planting and access measures required. The countryside enhancement strategy proposed in the adopted AAP are linked to and funded by development. There are no development allocations in draft S&GSNP that would support the delivery of the proposed Improved Landscape Area in Policy S&GS 20. It is considered that without an effective delivery mechanism the proposed Improved Landscape Area designation would not be implemented.</p> <p>Paragraph 16(f) of the NPPF states that plans, including neighbourhood plans, should “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)”. It is clear that the proposed Improved Landscape Area designation in Policy S&GS 20 duplicates Policy CSF/5 of the adopted Cambridge Southern Fringe AAP, which is not necessary. Policy S&GS 20 would be contrary to national policy, and as such would not meet Basic Condition (a).</p> <p>It is requested that the proposed Improved Landscape Area in Policy S&GS 20, and shown on Map 16, is deleted.</p>	Noted but not accepted. This issue has specific relevance to S&GS NP area and is therefore taken forward and updated as part of the NP

Para no.	Consultee ref.	Comment	Response from Parish Councils
Policy	K7	Having regard to the College's landholdings, in terms of specific policies in the Plan, we SUPPORT Policies S&GS 19 and S&GS 20:	Noted
Policy	K7	Map 16 (Appendix B of the Draft Plan proposes 'New Hedgerow and Hedgerow Tree Corridor on the boundary of St John's College land. The College support the proposal of the Improved Landscape Areas and their implementation by financial contributions "for development proposals coming forward in or otherwise impacting upon the Stapleford and Great Shelford Improved Landscape Area". St John's College continue to show support for the inclusion of this aspiration in the Neighbourhood Plan to be funded by s106 contributions from developers, should they be granted planning permission in the future within the plan area	Noted
Map 16	S1	Map 16, should be amended to remove the other external boundary lines. It is recommended that the proposed public open space shaded in red on the map located at the southwest of Cambridge Biomedical Campus (CBC) is checked against the emerging Local Plan policy masterplan for CBC.	Noted. To be amended
		Appendices	
A3: S. Conservati on Area Appraisal	S1	The map was provided by GCSP in 2021. It is recommended that the map is amended to be consistent with the quality of the emerging Local Plan policies, and other recent neighbourhood plan maps.	Noted. To be amended
A5: Cambridge	S1	Appendix 5 contains Map 1 that shows the habitat priority areas identified by Cambridge Nature Network. It is recommended that this is	Noted and accepted

Para no.	Consultee ref.	Comment	Response from Parish Councils
Nature Network		referred to as a Figure, rather than a map as it is an image extract from an external source. It is also suggested that the source is clearly defined.	
A6	K1	<p>EDBF objects to the following designations in draft S&GSNP:</p> <ul style="list-style-type: none"> the proposed Visually Important Open Land designation at Stapleford Allotments (as shown on Map 8 and described in Appendix 6) on the basis that this term is not defined, this land is already designated as Green Belt which is specifically about retaining openness, and the site is surrounded by dwellings and trees so it is not visible from the wider surrounding area [...] 	Noted. See below.
A6	K1	<p>Appendix 6 of draft S&GSNP seeks to explain why land at Stapleford Allotments is proposed as Visually Important Open Land. The term 'Visually Important Open Land' is not defined in draft S&GSNP, but it appears to be related to landscape matters. Policy SC/8 of the adopted South Cambridgeshire Local Plan already protects existing allotments, including Stapleford Allotments. It is not necessary to duplicate policies that already protect allotment use. There is limited visibility of Stapleford Allotments from the surrounding area. There is housing located to the west, south and east of the allotments, and there are trees, hedgerows and other vegetation at all of the boundaries to the allotments. It is incorrect to describe the land at Stapleford Allotments as 'visually important', when in fact the land is fairly well enclosed. The allotments are adjacent to roads, residential uses, and a primary school, and as such are unlikely to be a particularly tranquil area that warrant special protection for this reason. Paragraph 041 (Ref ID: 41) of the Planning Practice Guidance states that "<i>It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence</i>". The evidence put forward to explain and justify the proposed Visually Important Open Land designation at Stapleford Allotments is not robust,</p>	<p>The allotments are visible from Haverhill Road. There is also a well used permissive route going through the site. This area of Visually Important Open Land was identified initially thought the 2019 LCA work. See also Paragraph 8.9 in NP.</p> <p>There is no reason not to recognise the visual value of an area of land just because it falls within designated Green Belt. The NPPF specifies 5 possible functions that Green Belt land serve and they do not cover landscape or visual quality. The policy appropriately responds to the findings in the LCA 2019</p>

Para no.	Consultee ref.	Comment	Response from Parish Councils
		<p>and as such this proposed designation does not have regard to national policy and would not meet Basic Condition (a).</p> <p>It is requested that the proposed Visually Important Open Land designation of land at Stapleford Allotments (part of Site Ref. 8) is deleted from Map 8, and references to this proposed designation of the allotment land are removed from Appendix 6.</p>	
A7: Views T&U	K1	<p>[EDF objects to] the proposed Important Views from Stapleford Cemetery (View T) and Gog Magog Way (View U) (as shown on Map 9 and described in Appendix 7) on the basis that these are general views of the countryside rather than a notable view of a particular feature from a public footpath or vantage point</p>	<p>Views T and U were both identified initially in the LCA 2019, reviewed later by the steering group and included as part of engagement work in 2023. They are both highly valued by local people. View T provides long views NE across arable fields to the new countryside park between Hinton Way and Haverhill Road, and beyond to the settled hilltop estate at Fox Hill. The view contributes greatly to the tranquil setting of the cemetery. View U permits long views scanning from NW to NE, notably towards Clarks Hill in the N and a new local landmark (the aforementioned countryside park) and the settled hilltop estate at Fox Hill. It contributes to the rural setting of Stapleford village and the view point sits within Important Countryside Frontage between 41 Gog Magog Way and properties at Chalk Hill.</p>

Para no.	Consultee ref.	Comment	Response from Parish Councils
A7: Views T&U	K1	<p>Appendix 7 of draft S&G SNP describes the proposed important views at View T and View U, and seeks to explain why those views should be protected. There is no public footpath or bridleway across the land owned by EDBF at land off Hinton Way, and there are no public footpaths or bridleways within the proposed important views at View T and View U. The photographs of View T and View U show a typical view of the countryside at these locations, containing agricultural land, hedgerows and trees, and areas of woodland.</p> <p>There are no notable key landscape or topographic features within those views to identify them as particularly important or as a defining characteristic of the adjacent villages. The commentary for View T and View U in Appendix 7 of draft S&G SNP and the assessment of LCA B3 (Mingle Lane and Hinton Way arable lowland) in the Stapleford & Great Shelford Landscape Character Assessment (October 2019) does not identify any key landscape features or provide the evidence to justify why these views are sufficiently important to warrant special policy protection. It is noted that the Landscape Character Assessment did not identify View T as an important or key view. Paragraph 041 (Ref ID: 41) of the Planning Practice Guidance states that <i>“It [neighbourhood plan policies] should be concise, precise and supported by appropriate evidence”</i>. The evidence put forward to explain and justify the proposed important views at View T and View U is not robust, and as such these proposed designations do not have regard to national policy and would not meet Basic Condition (a). It is considered that View T and View U are general views of the countryside, and typical of other similar views on the edge of villages elsewhere in South Cambridgeshire</p>	<p>The views work undertaken for the S&GS NP is very comprehensive. The views were initially identified as part of the 2019 LCA. The views were reviewed by the NP Steering Group in 2023 and featured as part of a community-wide engagement exercise. The views provide both landscape and visual value. Appendix 7 provides comprehensive descriptions for each view and explains the important features within each of the views. The views work in the S&GS NP is robust and supported by the LCA 2019. Furthermore, there are other made neighbourhood plans in South Cambridgeshire that include policies that protect views. West Wickham NP, Waterbeach NP are just two examples</p>
		General comments	

Para no.	Consultee ref.	Comment	Response from Parish Councils
General	S1	The introductory paragraphs in the policies are quite verbose and provide a lot of background information. This could be reduced and edited down now that the neighbourhood plan is progressing to the Submission version.	Noted.
General	S7	An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area.	Noted
General	S8	An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure. NGET has identified that it has no record of such assets within the Neighbourhood Plan area.	Noted
General	K2	We welcome the recognition which the Plan gives Wandlebury Country Park and the contribution the Park makes to the landscape, biodiversity, and accessible natural green space of the Neighbourhood Plan Area.	Noted
General	K3	The Association for Cultural Exchange is keen to participate in the on-going development of the Neighbourhood Plan. We would be happy to make space available at Stapleford Granary to host future community consultation meetings.	Noted
General	K5	The Trust is wholly supportive of the draft Neighbourhood Plan and agrees with each of of the proposed policies (S & GS 1-20). From our perspective, the plan seems to include all the important issues relevant to the two villages. We were pleased to see that a photo from Magog	Noted.

Para no.	Consultee ref.	Comment	Response from Parish Councils
		Down towards Cambridge was included. The Trust is very appreciative of the enormous amount of work undertaken by the Neighbourhood Plan Group to produce the plan. Many congratulations.	
Consultation	K7	The Stapleford and Great Shelford Neighbourhood Plan Area was designated on the 8th November 2016. This Regulation 14 Consultation is the first formal consultation of the plan, but St John's College welcomed and took the opportunity to participate in the 'important stakeholder' engagement event in early 2024. St John's College support the Parish Councils taking the initiative and preparing a Neighbourhood Plan to positively shape the future of their area.	Noted
Local Plan	K7	<p>The adopted South Cambridgeshire Local Plan (2018) does not propose any significant growth within the parish boundaries. The only major allocation lies on the parishes northern boundary, south of Addenbrookes Hospital, Policy E/2: Cambridge Biomedical Campus Extension. Great Shelford and Stapleford is identified as a Rural Centre within the South Cambridgeshire Settlement Hierarchy.</p> <p>Within Rural Centres 'Development and redevelopment without any limit on individual scheme size will be permitted within the development frameworks of Rural Centres, as defined on the Policies Map, provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development'. This policy allows for growth within the settlement development framework, however the villages' development framework currently does not provide space for any significant development to meet the needs of the villages.</p>	Noted
NPPF 2023	K7	This being said, the National Planning Policy Framework states that it is strategic policies that should establish the need for any changes to Green Belt boundaries, and then where a need for changes to Green	Noted

Para no.	Consultee ref.	Comment	Response from Parish Councils
		<p>Belt boundaries has been established through strategic policies, detailed amendments to those boundaries can then be made through non-strategic policies, including neighbourhood plans.</p> <p>In the absence of strategic policies in the Local Plan that establish the need for any changes to Green Belt boundaries, it would not be appropriate for the Neighbourhood Plan to make changes.</p>	
NPPF 2023	K1	<p>We have some general comments on draft S&G SNP that should be considered for the Reg.16 version of the document. An updated NPPF was published in December 2023 and this version of national policy should be referred to in the Reg.16 S&G SNP document. A number of neighbourhood plans have now passed through the examination stage and been made in South Cambridgeshire. The Neighbourhood Plan Group for draft S&G SNP might find it useful to review some of the Examiner's Reports for made neighbourhood plans in South Cambridgeshire. For example, and relevant to draft S&G SNP, the Examiner for the Waterbeach Neighbourhood Plan needed to consider proposed Local Green Space designations on allotment land located within the Green Belt, and the Examiner for the Fulbourn Neighbourhood Plan needed to consider proposed locally important view designations that were general in nature and the importance and relevance of those views had not been assessed.</p>	Noted
NPPF 2023	S13	<p>We have some general comments on draft S&G SNP that should be considered for the Reg.16 version of the document. An updated NPPF was published in December 2023 and this version of national policy should be referred to in the Reg.16 S&G SNP document. A number of neighbourhood plans have now passed through the examination stage and been made in South Cambridgeshire. The Neighbourhood Plan Group for draft S&G SNP might find it useful to review some of the</p>	Noted

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		Examiner's Reports for made neighbourhood plans in South Cambridgeshire. For example, and relevant to draft S&GSNP, the Examiner for the Fulbourn Neighbourhood Plan commented that the designation of an Important Visual Gap was unnecessary as it conflicted with Green Belt policy.	
Plan as a whole	S13	Cambridgeshire County Council owns land on the northern edge of the Parish area, south east of Discovery Drive and Dame Mary Archer Way. A site location plan is enclosed with this letter. This land would be directly affected by some of the proposed policy designations within the draft S&GSNP.	Referred to map has not been provided. This was followed up in August 24.
Basic conditions	K1	In due course draft S&GSNP will be examined by an Independent Examiner who will determine whether the basic conditions for a neighbourhood plan have been met. As explained in this response, it is considered that some of the policies and designations in draft S&GSNP do not meet Basic Condition (a) and are inconsistent with national policy.	Noted
Basic conditions	K6	<p>We are of the opinion that the Regulation 14 S&GSNP does not meet all of the 'basic conditions' for neighbourhood plans. Specifically, we consider that some of the draft policies contained within the document do not have due regard to national policies and would not contribute to the achievement of sustainable development.</p> <p>In accordance with national policy, it is important that the S&SGNP supports the achievement of sustainable development and reflects the presumption in favour of sustainable development. We would highlight that the NPPF sets the following requirements for "Plan-making" (Chapter 3):</p>	Noted.

Para no.	Consultee ref.	Comment	Response from Parish Councils
		<p><i>“15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.</i></p> <p><i>16. Plans should: a) be prepared with the objective of contributing to the achievement of sustainable development;</i></p> <p><i>b) be prepared positively, in a way that is aspirational but deliverable;</i></p> <p><i>c) be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</i></p> <p><i>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</i></p> <p><i>e) be accessible through the use of digital tools to assist public involvement and policy presentation; and</i></p> <p><i>f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”</i></p> <p>We would also draw attention to additional guidance set out in NPPG on Neighbourhood Planning (2019). PPG Paragraph 005 states that <i>“Plans should be prepared positively, in a way that is aspirational but deliverable”</i>.</p> <p>Whilst formally setting out our formal objections to the proposed designation of the Site as a LGS and within a wider VIOL, we would warmly welcome a meeting to discuss matters further with the Steering</p>	

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		Group or Stapleford Parish Council, including the specific opportunities arising at Greenhedge Farm.	
Basic conditions	K8	<p>On behalf of our clients, Great Shelford Ten Acres Ltd (GSTA), we welcome this opportunity to comment on the draft Stapleford and Great Shelford Neighbourhood Plan (S&GS NP).</p> <p>Roebuck Land and Planning Ltd commend the work that has been undertaken in the preparation of the S&GS NP, however we feel that the Plan has some shortcomings that need to be rectified before it can progress to the final Submission version for examination. In its current form, we believe that it fails to meet the basic conditions as required by Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). Those we consider are not met include a,d and e:2</p> <p><i>“(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,</i></p> <p><i>(d) the making of the order contributes to the achievement of sustainable development,</i></p> <p><i>(e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)”</i></p> <p>The S&GS NP fails to meet the basic conditions because it fails to have regard to the national policies and advice contained in guidance issued by the Secretary of State, contrary to condition a. It also fails to contribute to the achievement of sustainable development which is contrary to condition d) and it is not in general conformity with the most up-to-date evidence base for strategic policies contained in the development plan for the area of the authority and is therefore contrary to condition e.</p>	Noted

Para no.	Consultee ref.	Comment	Response from Parish Councils
Basic conditions	K8	<p>The work undertaken by the Neighbourhood Plan Team is admirable, however there are some changes required to improve the plan to ensure that it stands the test of time and remains effective after the adoption of the GCLP. Otherwise, it should include a trigger for review to take account of any changes to strategic policies affecting the S&GS plan area.</p> <p>The Plan should be written in a concise and considered way. This would provide a clear and practical base on which to determine planning applications. In its current form, there is too much ambiguity and interpretation required to provide direction to the determination of planning applications.</p> <p>It is therefore concluded that the Plan fails to meet the basic conditions. It fails to have regard to national policies and advice, it fails to make a contribution to sustainable development, and it is not in general conformity with the up-to-date evidence base for the preparation of the eGCLP strategic policies for the area.</p>	Noted
Emerging Greater Cambridge Local Plan	S13	<p>In Policy S/13 of the adopted South Cambridgeshire Local Plan the Council committed to undertake an early review, including to address matters related to housing need. A call for sites exercise, issues and options consultation, and preferred options consultation for the emerging Greater Cambridge Local Plan were undertaken between 2019 and 2021. The Preferred Options consultation document contained a development strategy based on a medium plus growth option and a very limited amount of development directed to the villages. It is proposed in the Preferred Options document that Stapleford and Great Shelford continue to be classified as Rural Centres in the settlement hierarchy, and that these villages would be within a new Rural Southern Cluster which seeks to connect employment growth to housing in an accessible</p>	Noted

Para no.	Consultee ref.	Comment	Response from Parish Councils
		location. The Preferred Options document identifies land at the Biomedical Campus within the S&GSNP Area for expansion. The Plan sets out that a comprehensive landscaping plan, design parameters and a trip budget would be required; all of which would have the potential to conflict with the draft S&GSNP policies.	
Emerging Greater Cambridge Local Plan	S13	The evidence published in January 2023 for the emerging Greater Cambridge Local Plan indicates that because of economic growth in key sectors of the economy there is a higher housing need in Greater Cambridge. In 2023 the Government announced its aspiration for the significant growth of Cambridge, and the Budget in March 2024 included a commitment to funding and support for additional housing and economic growth. It is likely that the draft version of the emerging Greater Cambridge Local Plan would need to amend the preferred development strategy to address the evidence of a higher housing and employment needs and the Government's aspirations for growth. It is likely that additional site allocations in the more sustainable villages, including Stapleford and Great Shelford, would be part of an emended development strategy in the emerging Greater Cambridge Local Plan.	Noted
Emerging Greater Cambridge Local Plan	S13	It is considered that draft S&GSNP should take a much more positive approach to meeting housing and employment needs of the villages, and should not introduce policies that are clearly intended to limit development at the villages in the future and to restrict options for the growth of the villages through the emerging Greater Cambridge Local Plan process.	Noted
Emerging Greater	K8	We recognise that the S&GS NP (2024-2041) is in an unusual situation where there is no up-to-date adopted local plan covering the same plan period to 2041 (the South Cambridgeshire 2018 Local Plan only dealing with strategic planning from 2011 to 2031) resulting in a lack of	The S&GS NP will, once made, sit alongside the currently adopted 2018 Local Plan and in the future the GCLP. The policies in the S&GS NP are

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Cambridge Local Plan		<p>strategic direction and context. It is therefore important that the S&GS NP is capable of enduring post adoption of the emerging Greater Cambridge Local Plan (eGCLP) which will extend the Strategic Policies to at least 2041. [...]</p> <p>The issues faced by the eGCLP (to at least 2041) represent an unfortunate timing issue for the S&GS NP. Should the S&GS NP progress towards submission and referendum over the next 12-18 months, it runs the risk of being quickly superseded by policies in the eGCLP generally, and specifically should Gt Shelford be identified for growth within the neighbourhood plan period to 2041. As a key 'edge' settlement, Great Shelford is one of the more sustainable locations within the district and should therefore be able to deliver more development if required.</p> <p>Neighbourhood Plans must be in general conformity with the strategic policies contained in any development plan that covers their area. In this instance, it is simply not possible given the stage of the emerging Local Plan. Paragraph 30 of the NPPF states that: <i>"Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently."</i> Therefore, without any in-built flexibility or commitment to a review on adoption of the replacement GCLP, which would take precedence over the Neighbourhood Plan within a very short amount of time, the lifespan of the S&GS NP could be relatively short as any policies that are not in accordance would effectively be superseded by the newer planning policies.</p>	<p>compatible with strategic policies in the 2018 Local Plan (including Local Plan policy E/2: Cambridge Medical Campus Extension). The villages are surrounded by the Cambridge Green Belt. This is a strategic policy designation that the NP cannot amend. A NP cannot allocate sites for development within the Green Belt. The overall spatial strategy for the area is therefore established through the higher-level plan and the S&GS NP does not include a policy that directs development to specific locations.</p> <p>The S&GS NP is sufficiently flexible to be compatible with a revised strategic spatial strategy.</p>

Para no.	Consultee ref.	Comment	Response from Parish Councils
		The need for the S&GS NP to take account of the eGCLP evidence base and be sufficiently flexible to endure beyond the adoption of the eGCLP is a key theme of the following detailed comments.	
Historic environment	S5	<p>We would refer you to our advice 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/>.</p> <p>For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Cambridgeshire County Council.</p>	Noted
Heritage generally	K2	Cambridge PPF works to protect Heritage Assets and we therefore welcome the recognition that the Neighbourhood Plan presents an opportunity to identify and recognise locally important heritage assets that are not nationally listed. However, we are disappointed that the plan does not identify any buildings for nomination. In 2022, members of CPPF met with some residents of Great Shelford who were interested in identifying Buildings of Local Interest and gave them some guidance as to identifying buildings and the process. I am not sure on the progress they made. The Neighbourhood Plan is an opportunity to identify any buildings they identified and hopefully create an interest in this project.	Noted. NDHAs are not being brought forward as part of this Plan.
Heritage generally	S12 (HET)	CHET has reviewed the draft Stapleford and Great Shelford Neighbourhood Plan (S&GS NP), and notes and concurs with classification of the wealth of heritage assets present within the study area as a strength. The draft document underlines that protection of designated heritage assets existing within the two parishes, including	Noted.

Para no.	Consultee ref.	Comment	Response from Parish Councils
		<p>Conservation Areas and Scheduled Monuments, accords with Policy NH/14 of the adopted South Cambridgeshire Local Plan (2018). Further, it explicitly identifies the development of the S&GS NP as an opportunity to identify and recognise locally important heritage assets that are not nationally listed; this in particular is welcomed.</p>	
Heritage generally	S12 (HET)	<p>However, while the Plan contains some background on the earlier history of the parish, for the most part the valuable archaeological resource of the area is otherwise not mentioned, and there are no policies explicitly included to protect it.</p> <p>Stapleford and Great Shelford have a large number of designated heritage assets. Scheduled monuments within the parishes include nationally important sites such as Wandlebury Hillfort (National Heritage List Entry reference. 1009395), a causewayed enclosure and bowl barrow at Little Trees Hill (NHLE ref. 1011717), a further causewayed enclosure to the west of Great Shelford (NHLE ref. 1452825) two areas of extensive cropmarks (NHLE ref. 1006892 and 1006891) and Wormwood Hill Tumulus (NHLE ref 1006904). However, both parishes are also rich in undesignated archaeological assets, including further extensive cropmarks outlining areas of prehistoric to Roman settlement, notably to the west of Great Shelford (e.g. Cambridgeshire Historic Environment Record reference. 04503). Further assets include ring ditches (CHER ref. 08337), as well as medieval <i>earthworks</i> (CHER ref. 08903), <i>tumuli</i> (CHER ref. 08358) and <i>cropmark enclosures</i> (CHER ref. 08344) to the east of Stapleford, to name a few.</p> <p>Such important and irreplaceable below ground heritage assets can be damaged or completely destroyed by development works. Below ground non-designated assets can also play an important role as landscape features in the development of settlement character. We recommend that the steering group should contact Cambridgeshire County Council's</p>	<p>Noted. The plan has been amended to provide more detail on these important heritage assets. Local Plan policy NH/14 'Heritage Assets' as well as national policy and guidance will apply to proposals affecting heritage assets as with other areas.</p>

Para no.	Consultee ref.	Comment	Response from Parish Councils
		Historic Environment Record (HER) to improve the evidence base historic environment assets within the Neighbourhood Plan document (archaeology@cambridgeshire.gov.uk).	
Heritage generally	S12 (HET)	<p>With regard to built heritage; whilst the development of the S&GS NP presents an opportunity to identify and recognise locally important heritage assets that are not nationally listed, the document itself does not identify these beyond reference to the Conservation Area Character Appraisals of 2007 (Great Shelford) and 2021 (Stapleford). The Cambridgeshire Local Heritage List Project (https://local-heritage-list.org.uk/cambridgeshire) is currently in the process of updating the list of locally important assets for Stapleford and Great Shelford, and there is an opportunity here to enhance and support both complimentary datasets. We would suggest contacting the South Cambridgeshire District Council Conservation Team regarding any pending additions.</p> <p>Paragraphs 7.18-7.19 identify 'Traditional Buildings and the Historic Environment' as a contributing factor in development of Policy S&GS 7: Mitigating and adapting to climate change through building design'. It is particularly encouraging to see explicit reference to the importance of adopting a 'whole building approach' along with methodologies which retain heritage significance when undertaking sustainable retrofit of traditional building stock, signposting to useful current guidance for homeowners.</p> <p>Whilst the draft Neighbourhood Plan is aspirational in its approach to non-designated heritage in particular, in our view the document should be revised to incorporate a policy that explicitly addresses appropriate protections for Stapleford and Great Shelford's valuable built heritage and below ground assets of archaeological interest, whether designated or undesignated. This should support and expand on Policy NH/14 of the Cambridge Local Plan (2018) and in accordance with the NPPF</p>	Noted. The plan has been amended to provide more detail on these important heritage assets. Local Plan policy NH/14 'Heritage Assets' as well as national policy and guidance will apply to proposals affecting heritage assets as with other areas.

Para no.	Consultee ref.	Comment	Response from Parish Councils
		(2023 paras. 195 to 214), setting out the evidence base in more detail. CHET can suggest wording for such a policy on request.	
General	S1	Accessibility: The document uses italics for headings and for some quotations. It is recommended for accessibility of the document for users, to not use italics.	Noted. NP amended.