

Thriplow & Heathfield Neighbourhood Plan

Examiners questions and Reg 16 responses

December 2024

This document contains:

- I - Response to Examiner's points for clarification
- II – Response to SCDC representation
- III – Responses to all other representations made (September 2024)

Examiner's comments

Owner	Policy reference	Comment	T&H PC response
Andrew Ashcroft	THP1	<p>Could the send part of the policy be combined with the first part?</p> <p>The third part is supporting text rather than a policy. I am minded to recommend that it is relocated into the supporting text. Does the Parish Council have any comments on this proposition?</p>	<p>Yes. Remove number 2 and say 'This can be done by..'</p> <p>Clause 3 can be placed in Policy Intent, checking there is no duplication.</p>
Andrew Ashcroft	THP2	<p>Paragraph 6.4.1 helpfully advises that the policy is aspirational. In principle such an approach is</p>	<p>2041 is a long time ahead and changes in planning law are likely to happen in our volatile</p>

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		acceptable. However, are such facilities likely to be delivered in the Plan period?	times. We want to encourage and definitely not to limit any possibility for getting such developments in Heathfield. The lack of amenity there is definitely an issue to address.
Andrew Ashcroft	THP3	This is a very good policy which captures the character of this part of the neighbourhood area?	
Andrew Ashcroft	THP4	To what extent has the Parish Council assessed the two proposed Countryside Frontages against parts a) and/or b) of policy NH/13 of the South Cambridgeshire's Local Plan policy?	If the Examiner looks at the Landscape Character Assessment, which is replicated within Appendix 2 of the submission Neighbourhood Plan, there is a clear analysis against Policy NH/13 where 1(a) is the most relevant criterion to consider the points of uniqueness in Thriplow village and also in the landscape between Heathfield and Thriplow.
Andrew Ashcroft	THP5	As submitted, the policy has a negative approach and does not advise about what a development proposal would need to do to secure planning permission. Was this the Parish Council's intention?	<p>Yes it was intended. The parish's view is that views should be protected, since footpaths are limited in scope and central to village and edge of Heathfield life.</p> <p>View 11 could be removed, in light of discussion by PC, since a long view is prohibited by the sewage works and road at the back of the field.</p> <p>View 12 should remain, not to identify a view in order to protect land, but to identify views which were of most value to people and which</p>

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		<p>The Parish Council's comments on the District Council's representation views 11 and 12 would be very helpful (see the request later in this Note).</p>	<p>are key contributors to sense of place and to defining settlement character. Heathfield has a very different character to Thriplow, but the rural character of the setting is still paramount.</p> <p>See discussion from SCDC's points below.</p>
Andrew Ashcroft	THP6	<p>I am minded to recommend that the policy comments about use classes in the Use Classes Order rather than to specific uses. Does the Parish Council have any comments on this proposition?</p>	<p>On considering the Use classes Order designations we could see little of relevance or help. We also understand that the Use Classes Order system is changing and we see specific uses more meaningful.</p>
Andrew Ashcroft	THP7	<p>The policy proposes a well-considered selection of Local Green Spaces.</p> <p>However, I am minded to recommend that the policy element takes on matter of fact approach in NPPF (and as suggested by the District Council). Does the Parish Council have any comments on this proposition?</p>	<p>Yes the policy should take on the approach of the NPPF if this clarifies the matter.</p>
Andrew Ashcroft	THP8	<p>The policy takes a robust approach towards biodiversity. However, it has significant overlaps with local plan policies. Which</p>	<p>Reference to this is in previous comments included in Appendix 3 of the Statement of Consultation (on page 15, column 4).</p>

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		It would be helpful if the Parish Council highlighted the parish-distinctive elements in the policy	Where there is overlap we are happy to have any duplication removed.
Andrew Ashcroft	THP9	This is another robust policy. Nevertheless: <ul style="list-style-type: none"> • should Parts 1 and 2 be applied proportionately? 	Yes Parts 1 and 2 should be applied according to their scope and size.
Andrew Ashcroft	THP9	<ul style="list-style-type: none"> • the third part of the policy is supporting text and I am minded to recommend that it is repositioned into the supporting text. Does the Parish Council have any comments on this proposition? 	We are aware that this is such a significant issue that it needs to be in the policy area. We are mindful however to not duplicate anything. It is up to the examiner to recommend where text should go for best use.
Andrew Ashcroft	THP10	This is a very detailed policy which sets out comprehensive guidance for the development of this sensitive site	Thank you.
Andrew Ashcroft	THP11	The policy takes a well-considered approach to rural exception sites in Thriplow. However, does it bring any added value above national and local planning policies?	Please refer to Basic Conditions Statement p34 b) H/11 to understand the particular housing needs of this divided parish and why we need a specific policy. The density of development and lack of amenity in Heathfield makes it unsuitable for such development.
Andrew Ashcroft	THP12	The policy is a combination of policy and supporting text. I am minded to recommend that the non-policy elements are relocated into the	The Parish Council sees parking provision such a difficult issue (single track roads in

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		supporting text. Does the Parish Council have any comments on this proposition?	village, unadopted roads in Heathfield) that emphasis on parking problems is paramount. The Examiner will know best to keep the most relevant parts.
Andrew Ashcroft	THP15	The approach taken towards the use of potential future CIL funding is appropriate. However, is the issue a land use policy?	Flagging up existing and projected shortcomings in infrastructure provision is an important part of neighbourhood planning. In this case, the policy was prepared in response to comment made at Reg 14 stage by SCDC in particular that the language in the NP regarding infrastructure should remain “broad enough so that they could be applied to different policy realities” We are aware of other adopted neighbourhood plans with similar policies being in place. Policy G12 in Great Gransden NP (Hunts) Policy SWB 11 in Swaffham Bulbeck NP (ECDC) Policy WNP ICI in Witchford Infrastructure and Community Facilities (ECDC)
Andrew Ashcroft	Representations	Does the Parish Council wish to comment on any of the representations made to the Plan? I would find it helpful if the Parish Council commented on the representations received from	Responses below.

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		<p>Cambridgeshire County Council and the Environment Agency (both generally and on Policy THP10).</p> <p>The District Council make a series of comments both on the policies and other general matters. It would also be helpful if the Parish Council responded to this representation.</p>	

Response to SCDC representation

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South Cambridgeshire District Council	n/a	<p>South Cambridgeshire District Council previously commented on the PreSubmission (Regulation 14) draft of the Thriplow and Heathfield Neighbourhood Plan that was consulted on in March 2023. South Cambridgeshire District Council is taking the opportunity to comment further on the Submission (Regulation 16) Plan.</p> <ol style="list-style-type: none"> <li data-bbox="824 643 1491 890">1. South Cambridgeshire District Council has worked with the Thriplow and Heathfield Parish Council during the preparation of the plan. We appreciate the hard work that has gone into getting the neighbourhood plan this far along in the process. <li data-bbox="824 938 1491 1343">2. We note that the Submission version of the Thriplow and Heathfield Neighbourhood Plan has been revised after considering the representations received during the Pre-Submission (Regulation 14) consultation. South Cambridgeshire District Council submitted 82 comments in our PreSubmission response, most of which have been taken into account and have resulted in revisions 	

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		<p>to the plan. We very much welcome the changes that have been made.</p> <p>3. There have also been meetings with the Thriplow and Heathfield Parish Council to discuss the plan as it has evolved and to support the Parish Council in preparing the Submission version of the plan.</p> <p>4. The comments we now make now concentrate on matters that relate directly to whether, in our opinion, the Thriplow and Heathfield Neighbourhood Plan meets the Basic Conditions.</p>	
South Cambridgeshire District Council	Policies Map	<p>6. Our Pre-Submission response recommended one overall “Policies Map” on an Ordnance Survey base is included in the Plan with, where necessary, more detailed inset maps for specific areas – for example there could be one showing the whole parish and insets for the policies. Where planning policies relate to a specific site or area of land it is essential that the boundary of that designation can be clearly identified on a map. Also, we would suggest that policy THP 10 is referred to on the broader proposals map. This map has not been included and we</p>	<p>6. Agree with what with South Cambridgeshire District Council proposing, and the council will work with us to prepare the necessary maps</p>

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		<p>therefore continue to recommend this addition be included in the Referendum Plan.</p>	
<p>South Cambridgeshire District Council</p>	<p>Planning Policies</p>	<p>7. Paragraph 6.1 (page 36) states: "This chapter contains the planning policies. These planning policies will provide the basis for the determination of planning applications involving land that falls in the Thriplow and Heathfield NP area." We recommended that this paragraph recognise that the polices in the plan contribute to the wider South Cambridgeshire area development plan documents and national policies. As worded, it implies this is the sole basis for planning applications in the area and the local plan and National Planning Policy Framework (NPPF) become null and void.</p> <p>8. Section 6.11.2 and page 46 references the 2021 NPPF. The amended National Planning Policy Framework was published on 19 December 2023 and so the Plan should be updated accordingly to reference NPPF 2023, paragraph 131 unless, by the time the Referendum Plan is prepared the new</p>	<p>7. Examiner to add in: "We recommended that this paragraph recognise that the polices in the plan contribute to the wider South Cambridgeshire area development plan documents and national policies".</p> <p>8. 6.11.2 page 46: should say: NPPF 2023, paragraph 131? Any other cases of this need to be changed as well.</p>

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		<p>Revised NPPF has been published. It may well be the case that the new NPPF will have been published before the examination of the Plan is complete and we would ask the Examiner to address how the Plan references any changes to national policy and whether focused consultation on how the new NPPF impacts on the submitted Neighbourhood Plan is necessary?</p>	
<p>South Cambridgeshire District Council</p>	<p>THP 1: Improving the character and quality of Heathfield</p>	<p>9. It is noted that amendments to this policy have been made and in particular we are pleased that additional photographs (figures 1 to 7) have been added to illustrate the assessment of the issues raised and which supports the design rationale for the policy.</p> <p>10. In terms of the policy itself, we remain of the opinion that the scope needs to be narrowed and parts that repeat policies in other sections of the Plan should be removed. All planning policies in the neighbourhood plan will apply, as appropriate, to the consideration of planning applications. We consider that the following amendments would help to achieve this clarity:</p>	<p>9. Thank you.</p> <p>10. We agree.</p>

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		<ul style="list-style-type: none"> ○ Policy part 3) 'Existing challenges relating to design, landscaping and layout at the Heathfield estate will not be accepted as an excuse for poor standards of design in any future development' is removed. Policy HQ/1 of South Cambridgeshire's Local Plan requires that all new future development must be of high quality design. Similarly, each application should be judged on the merits of the application, rather than the precedent (good or bad) of what has gone before. ○ Suggest in Policy part 4) that 'expected' is replaced with encouraged, this is because it is unreasonable to expect all development proposals to improve the character of the area. ○ Suggest in Policy part 4) that 'as far as they are applicable to the proposal' lacks clarity and could be removed. <p>11. For policy part 2) we recommend that the following wording is added to the policy as</p>	<p>Policy part 3) 'Existing challenges relating to design, landscaping and layout at the Heathfield estate will not be accepted as an excuse for poor standards of design in any future development' should be removed.</p> <p>Policy part 4) that 'expected' should be replaced with 'encouraged',</p> <p>'as far as they are applicable to the proposal' lacks clarity and should be removed.</p> <p>11. Add to the policy as part 2) b) " Where trees are within any proposed development</p>

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		<p>part 2) b) " Where trees are within any proposed development site, tree information will be required conforming to BS5837: Arboricultural Impact Assessment and tree survey. To manage tree retention and tree mitigation planting opportunities ". The current part b) would become part 2) c).</p> <p>12. Policy part 4) states "where the scale permits". This wording is too vague and needs to be more specifically defined. Is a householder application too small to be affected? Is it major (as defined by the NPPF) applications only? Only residential development? There is also repetition of reference to the scale of the proposal". Importantly, improvements to the environment, landscape and public realm outside a development site can only reasonably be delivered through a Section 106 Planning Obligations where, in accordance with paragraph 122 of the Community Infrastructure Levey Regulations, such an Obligation "may only constitute a reason for granting planning permission for the development if the obligation is-</p>	<p>site, tree information will be required conforming to BS5837: Arboricultural Impact Assessment and tree survey. To manage tree retention and tree mitigation planting opportunities ". The current part b) would become part 2) c).</p> <p>12. Remove "where the scale permits".</p> <p>Remove repetition of reference to the scale of the proposal.</p>

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		<p>a. (a)necessary to make the development acceptable in planning terms;</p> <p>b. (b)directly related to the development; and</p> <p>c. (c)fairly and reasonably related in scale and kind to the development.”</p> <p>Paragraph 5 of the Policy acknowledges this and, as such, the usefulness of paragraph 4 is questioned.</p>	<p>Para. 5: Not sure what to make of this? ...we will leave to Examiner’s discretion.</p>
<p>South Cambridgeshire District Council</p>	<p>THP 2: Provision of additional amenities in Heathfield</p>	<p>13.No amendments to the wording of this policy have been made since our presubmission response, and our comments are therefore re-iterated:</p> <ul style="list-style-type: none"> o Our Pre-Submission response reminded the Parish Council that if there is no new development in Heathfield (which the Neighbourhood Plan states it doesn’t support), then there will not be new developer contributions to provide the additional amenities sought in Policy THP2, unless in the specific circumstance that a fully funded application for community use is submitted. o Also, our pre-Submission response commented that in relation to the policy part 2), whilst it appears the intention is to secure 	

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		<p>community uses compatible with continued employment use of the site, as an existing employment site Local Plan Policy E/14 Loss of Employment Land to Non Employment Uses would apply.</p> <p>14. Policy part 1) states "strongly supported". It is recommended that 'strongly' is removed so this is amended to state "supported" only.</p> <p>15. Also is the "shop" referred to meant to be a "community shop"? Otherwise it implies any Use Class E (such as a corner shop etc) will be acceptable.</p>	<p>13. It would be negative to omit this in the light of SCDC's comments. We do not know how law may change between now and 2041. But amenities may be provided by erosion of Green Belt law and presence of A505.</p> <p>14. Okay to remove.</p> <p>15. Any type of shop would be better than none. Liaison between Business Centre and community is to be encouraged. Evidence is already shown of this by present owners.</p>
<p>South Cambridgeshire District Council</p>	<p>THP 3: Protecting and enhancing village character in Thriplow</p>	<p>16. The objective and policy aims continue to be supported.</p> <p>17. In the submission version of the plan it is noted that a new section has been added to policy THP 3, at part 3) which the Parish Council has noted has been added to</p>	

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		<p>clarify that development proposals that would erode the character of the rural lanes would not be supported. The character appraisal provides evidence to support the insertion of the first part of this clause. However the latter section is very similar, but does not exactly repeat, the requirements of part 4) of Policy TI/2: 'Planning for Sustainable Travel' of the South Cambridgeshire Local Plan. We recommend removing the section 'through a transport assessment or, in the case of a smaller schemes, in an accompanying Design and Access/Planning Statement' as the plan can highlight localised traffic capacity and safety issues, or infrastructure deficiencies that would need to be addressed when considering development proposals but it is the responsibility of the local planning authority (LPA) to assess development proposals submitted for planning permission.</p>	<p>17.Remove 'through a transport assessment or, in the case of a smaller schemes, in an accompanying Design and Access/Planning Statement'.</p>

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South Cambridgeshire District Council	THP 4: Important Countryside Frontages in Thriplow village	<p>18. In our pre-submission response we acknowledged that the views and distinctiveness of the surrounding landscape are important to the village but their protection must be brought about in other ways more in keeping with Local Plan policy purposes. Also, we noted that a considered Landscape Character Study had been provided and this document potentially provided a series of high-level recommendations which could be used to convey what would be acceptable or unacceptable when it comes to development. This would offer a better and more joined up approach to managing development. We continue to highlight these comments.</p> <p>19. We note that amendments to this policy have been made to remove 3 of the proposed Important Countryside Frontages (“The View”, “The Baulk” and “Narrow Lane”). However, it is reiterated from our previous comments that the two frontages remaining to be designated as Important Countryside Frontages (as defined in the 2018 Local Plan), ‘Sheralds Croft Lane and Foremans Road’ and</p>	<p>18. We value the LCA (Appendix 2 to Plan) and wish only to further its intentions in the ICF and Locally Important Views framework which the council uses. Perhaps this could be further emphasised in policy wording?</p> <p>19. Regarding ICFs, the land beyond is Green Belt and the intention was never to identify a view in order to protect land, but to identify views which were of most value to people and which were key contributors to sense of place and to defining settlement character. Also the removal of permissive footpath beyond these 2 views by the farm is to be highlighted as a</p>

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		<p>'Churchyard', do not fulfil the criteria in part a) or b) of policy NH/13 of The South Cambridgeshire's Local Plan policy. It is important that the ICF conform to the approach taken in the Local Plan policy. Also, both proposed ICFs, by virtue of being outside the development framework and within greenbelt, assume an already established resistance to development in these areas, especially as they are not accessible from a street.</p>	<p>problem in being cut off from wider walks we were free to use previously.</p> <p>Heathfield has a very different character to Thriplow which it was important to establish and value.</p> <p>Views 11 and 12 were included as part of the Regulation 14 consultation into the NP. And also to reflect the high priority attached by Heathfield residents to the close connection to the surrounding countryside. This came out strongly in the November 2021 consultation work done.</p>
<p>South Cambridgeshire District Council</p>	<p>THP 5: Parish-wide locally valued views</p>	<p>20. Our pre-submission comments recommended that further consideration should be given to the evidence behind the identified views to ensure they are robustly justified and stand up to scrutiny during decision making. We note that the submission version has updated Appendix 2 to include an assessment of views from Heathfield and that the additional wording within the applicable findings from the Landscape Character Assessment 2020 sections now generally provide a more robust link to how the proposed views relate to the character-based work. However, we question the validity of View</p>	<p>20. The wording in Appendix 2 has shown connection to the LCA much more clearly in our Submission Plan using the correct criteria. We have all put a lot of work into this, to show how it is OUR neighbourhood. Surely this is what Neighbourhood Planning is about?</p> <p>View 11 is not much but it is the only outward looking part of Heathfield. If it is limited by Sewage Works beyond, that is no reason to belittle it.</p> <p>Ringstone Open Space is governed by Parish Council management of space and</p>

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		<p>11 'from greenway at Kingsway' as it is not so much a view as protection of a field to the north of Kingsway development. Also, View 12 is unnecessary and the view is misidentified as from a point beyond the hedgerow boundary around the open space while the description states it is from Ringstone across the open space. The amount of enclosure which the open space enjoys does not allow for those outward views. A small gap in the hedge equally does not allow for a distinct view. Therefore, we recommended that view 11 and view 12 are removed.</p>	<p>landscaping which has been seriously underspent and neglected since it was built and needs much more involvement from people who know about the community, the ecology and environment as well as providing defensible space for public use. (see new comments and guidance from Cambs Constabulary)</p> <p>The opening in the hedge is a hangover from a previous industrial use of the site. It needs re-designing to suit the present residential recreational use and needs of dog and other walkers and active travellers. Opening up to provide view and easier surveillance is required for defensible and crime free safe design.</p> <p>Fortunately Heathfield does have the concrete path built by the parish council along with the farm owner, to provide dual use by school children on bikes as well as agricultural vehicles, going from Heathfield to Thriplow Church Street. It was an appeasement because KWS (tenant of Smith Farms) took away a public footpath and a diversion had to be found.</p>

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<p>South Cambridgeshire District Council</p>	<p>THP 6: Supporting the rural economy</p>	<p>21. It is recommended that part 1) of Policy THP 6, is changed from ‘will be permitted subject to’ to ‘will be supported subject to’.</p> <p>22. Policy needs to include semi-colons and to say "and" "or". Based on the current list without this, it could be argued that proposals need only do one of the criteria.</p> <p>23. We query whether the policy is supporting proposals for new employment development (B1, B2 and B8 uses) and/or expansion of existing employment premises, and/or other uses? Currently the policy is not clear on what ‘type’ of development this policy is supporting as the policy states ‘Development proposals which support existing agricultural and other land-based rural businesses...’. Amendments should be made to the policy wording to provide clarity and to be consistent with Local Plan policies E/12, E/13, E/16, E/17 and E/18. Also, we suggest rewording to ‘New Development’.</p> <p>24. Recommend removing part 1) b) ‘Not damaging the residential environment or</p>	<p>21. Fine to change as suggested</p> <p>22. Fine to change as suggested</p> <p>23. Agreed that wording should encourage new employment in wording</p> <p>24. Fine to change as suggested.</p>

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		<p>have an unacceptable impact on the roads in the parish'. Also, in part 1) c) it is recommended to remove 'and tranquillity' and 'through inappropriate urbanisation, noise or light pollution'. This point would read 'Not adversely impacting rural character in the parish'. These changes are suggested as</p> <p>Policy HQ/1 of South Cambridgeshire's Local Plan protects the health and amenity of occupiers and surrounding uses from development that is overlooking, overbearing or results in a loss of daylight or development which would create unacceptable impacts such as noise, vibration, odour, emissions and dust. Policy SC/9 of South Cambridgeshire's Local Plan states that 'Development proposals which include new external lighting will only be permitted where it can be demonstrated that: ... there is no unacceptable adverse impact on the local amenity of neighbouring or nearby properties, or on the surrounding countryside'. The supporting text for the policy does not evidence what would be considered as inappropriate urbanisation. 'Tranquillity' is an ambiguous qualitative term which would need to be evidenced in quantitative terms if proposals were asked</p>	

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		<p>to ensure they would not cause any adverse impacts.</p> <p>25. In regard to any unacceptable impact of development proposals on roads in the parish, the Neighbourhood plan can highlight localised traffic capacity and safety issues, or infrastructure deficiencies that would need to be addressed when considering development proposals. However, this policy wording is slightly ambiguous as the supporting policy text states that 'leading to growth in traffic movements along rural roads', presumably it's about traffic generation? We would recommend re-wording this policy objective to provide clarity on this point.</p>	<p>25. Fine to change as suggested</p> <p>The fact is that HGV traffic should only come as far as to the KWS road on Gravel Pit Hill before the village 30mph sign at the junction. Middle Street should have no through traffic of HGVs. Children cannot walk independently on Middle St because it has no footpath and continually changing blind spots as it curves around. We have been unable to get a 20mph limit on Middle St where it is most needed. Road markings for safe pedestrian use are necessary.</p> <p>So lorries should have to turn off before they reach the village and should only come from A505, not through the village.</p> <p>It is so much common sense to keep the industry on the A505 side.</p>

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South Cambridgeshire District Council	THP 7: Heathfield Local Green Spaces	<p>26. Paragraph 107 of the NPPF states that policies for managing development within a Local Green Space should be consistent with those for Green Belts. For consistency with other neighbourhood plans in the district, we would recommend that the wording in part 1) of the policy, relating to development on Local Green Spaces, is amended to “Development proposals within the designated local green spaces will only be supported in very special circumstances.”</p>	<p>26. Fine to change as suggested</p>
South Cambridgeshire District Council	THP 8: Promoting nature recovery by protecting existing sites and features, increasing parish biodiversity and delivering biodiversity net gain.	<p>27. As per our Pre-Submission response we consider that overall, the policy repeats elements already contained in the adopted local plan and needs to focus on local elements. The most locally distinct element of the policy is part 3) but this lacks adequate evidence. We recommend the following changes:</p> <ul style="list-style-type: none"> ○ Part 2) needs to be shortened or removed because its bullet points are currently too similar to Local Plan Policy NH/4 Biodiversity. ○ Part 3) refers to blue infrastructure, but there is nothing in the 	<p>27. Fine to change as suggested.</p> <p>Fine to change as suggested.</p>

Owner	Policy reference	Comment	T&H PC response
		<p>supporting text relating to this. Maybe this should be removed, as Policy THP 9 is more related to this?</p> <ul style="list-style-type: none"> • Parts 3 and 4) rely upon Map 19. However, we remain unsure as to the basis and methodology for identifying the suitability of these areas. <ul style="list-style-type: none"> o In relation to part 6) about developer contributions, we previously noted that this is quite similar to part 3) of policy NH/4 'Biodiversity' the adopted South Cambridgeshire Local Plan, and therefore we suggest that this part of the policy is removed. <p>28. We support the overall policy as outline and take this opportunity to highlight that:</p> <ul style="list-style-type: none"> o currently the LPA is unable to dictate where offsite BNG credits are purchased/created (as the Environment Act 2022 specifically references a "free and open market"). Therefore, and outside of the neighbourhood plan, the Parish may wish to explore setting up their own Habitat Bank which could 	<p>Map 19 and associated research and text in policy were provided by a local expert who works for Natural England and whose specialist subject this is. Since she is a resident and a daily dog walker in the parish we trust her assessment.</p> <p>Agree to removal of part 6) of the policy.</p> <p>28. Thank you for highlighting this. We need to engage local community on this issue.</p>

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		<p>secure local offsite credits to meet the goals set out in this policy and,</p> <ul style="list-style-type: none"> ○ the LPA can agree a Section 106 agreement (Town and Country Planning Act) to secure the 30 years of management with the landowner. This would help to secure biodiversity improvements closer to the parish, rather than further afield at one of the established Habitat banks near Fulbourn or West Wickham. 	
<p>South Cambridgeshire District Council</p>	<p>THP 9: Protecting and enhancing the parish tributary feeding the Hoffer Brook</p>	<p>29. Our Pre-Submission response for Policy THP 9 recommended removing part 2) because it repeats local plan policy and to focus the policy on Hoffer Brook (which has good evidence to back-up the case for its protection). It might be more appropriate to move the list of works to supporting paragraphs, given that during the lifetime of the Plan other initiatives might be required to improve Hoffer Brook and its tributaries. As part 2) has not been amended, we continue to make these recommendations.</p> <p>30. Part 1) and Part 2) (please also refer to comment above) of Policy THP 9 need to</p>	<p>29. Remove part 2 where it repeats local plan.</p> <p>Also appropriate to move list of works to supporting paragraphs.</p> <p>30. Yes add in that this is not necessary for minor householder applications</p>

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		<p>be clearer about what "development proposals". This is recommended as it is disproportionate and onerous to require a householder application to do all of this. Policy needs to specify minor development or words to that effect.</p> <p>31. It is noted that the Submission version of the plan now includes a reference to the Cambridgeshire Flood and Water Management SPD and the Council supports the inclusion of this reference as it provides relevant guidance. However, this document does not include word 'management' in the title and should be referenced 'the Cambridgeshire Flood and Water SPD'.</p> <p>32. Part 2) of Policy THP 9 references 'SPD Biodiversity Issue B6 – Sustainable Drainage Systems', it is recommended that this reference is amended to 'Greater Cambridge Biodiversity SPD, Sustainable drainage systems, paragraph 5.5.16- 5.5.20. This provides clarity as to which specific document and section the policy is referencing.</p>	<p>31. Remove 'management'</p> <p>32. amend to be 'Greater Cambridge Biodiversity SPD, Sustainable drainage systems, paragraph 5.5.16- 5.5.20.</p>

Owner	Policy reference	Comment	T&H PC response
		<p>33. However, as SPD's provide guidance instead of policy we recommend that part 2) removes the reference to the SPD and that both references to SPD's are added to the supporting text for the policy. Part 2) should be amended to "All proposals will be expected to incorporate sustainable drainage measures as a way of both managing surface water flood risk and protecting water quality in the parish." And the supporting text should include "It is expected that reference will be made to the Cambridgeshire Flood and Water SPD and the Greater Cambridge Biodiversity SPD (particularly section, paragraphs 5.5.16 to 5.5.20)".</p>	<p>33. Yes part 2 will be amended to say 'All proposals will be expected to incorporate sustainable drainage measures as a way of both managing surface water flood risk and protecting water quality in the parish</p> <p>'It is expected that reference will be made to the Cambridgeshire Flood and Water SPD and the Greater Cambridge Biodiversity SPD (particularly section, paragraphs 5.5.16 to 5.5.20)</p>
<p>South Cambridgeshire District Council</p>	<p>THP 10: Grainstore site allocation</p>	<p>Within our Pre-submission response we objected to the affordable homes on this allocation being prioritised for local people. However, we have subsequently advised the Parish Council that we no longer object in principle to local connection criteria being applied to the affordable homes on this development. We now consider that it is acceptable for any additional allocations identified in Neighbourhood Plans (i.e. sites that are not already Local Plan allocations or sites</p>	<p>Problem that planning application has come in before this plan has gone to referendum. Application is not following our policy, though developers have said they have consulted with us, they have not changed anything from their first plans before lockdown. We must object to it.</p>

Owner	Policy reference	Comment	T&H PC response
		<p>with planning permission) to include a local connection criteria, as although these allocations will contribute to meeting overall district-wide housing needs, they are generally brought forward to meet local needs, in a similar way to rural exception sites which have a local connection criteria applied.</p> <p>34. We recommended in our Pre-submission response that part 7) c) (previously second i) was amended and as no change has been made we reiterate that this is amended to "Enhance vegetation and hedgerows to maintain and encourage bat foraging opportunities" as the current text seems quite specific.</p> <p>35. Paragraph 6.10.13 makes a specific reference to the process for the site's identification through the Parish wide call for sites in 2020, but the link in this paragraph is broken and it is not possible to view this supporting document which supports the sites availability and deliverability. If links to non-statutory supporting evidence documents are included in the plan it should be ensured</p>	<p>34. Edit 7)c to say 'Enhance vegetation and hedgerows to maintain and encourage bat foraging opportunities'</p> <p>35. Need to remove full stop in link.</p>

Owner	Policy reference	Comment	T&H PC response
		<p>that these links will remain accessible in perpetuity of the plan being an adopted part of the development plan.</p> <p>36. Part 6) a) criteria need to include semi-colons and to say "and" "or". Based on the current list without this, it could be argued that proposals need only do either i) or ii) and iii).</p>	<p>36: add ‘, and’ at end of 6)(i)</p>
<p>South Cambridgeshire District Council</p>	<p>THP 12: Improving parking provision and improving road safety in Thriplow and Heathfield</p>	<p>38. We noted in our Pre-Submission response that policy THP 12 refers to limiting the use of ‘rear parking courtyards’, but in some villages in South Cambridgeshire, parking courtyards have been successful as part of a variety of car parking options for residents in neighbourhoods. The submission version of the plan has no amendments to the policy wording and we therefore continue to suggest that the policy wording may be too prescriptive in restricting their use in future development proposals. The consequence can be car dominated streets and frontages which can be</p>	<p>We need to emphasise that single track roads such as Lodge Road are not appropriate for on street parking. Fowlmere Road can take one sided parking, but not formally agreed which side.</p>

Owner	Policy reference	Comment	T&H PC response
		<p>unsightly and restrict road widths for emergency and service vehicles.</p> <p>39. We queried in our Pre-Submission response what evidence there is to support the statement that there is 'proven underutilisation in the parish'. Paragraph 6.1.34 mentions the recommendation from the Masterplan for Heathfield undertaken by AECOM in 2022 to 'Undertake a design and access study of the rear parking courts at Ringstone and Hurdles Way to understand why they are underutilised and identify solutions' - has this study happened yet? We recognise the Submission version of the plan refers to page 80 of the 2022 AECOM Masterplan report which states 'Rear parking courtyards and garages are under used and constitute hidden spaces with limited positive contribution to the wider character of the Local Character Area', but in our opinion this does not offer robust evidence to support the policy wording of 'proven underutilisation'.</p> <p>40. We also noted in our Pre-Submission response that given the uncertainty about</p>	<p>The reason we said the rear parking courts are under-used was to emphasise the need for study and re-design of rear parking courts in the light of reuse of garage spaces and how to make them more user-friendly. We do not have the capacity or funding to do this design study as NP group. Main problem is lack of enforcement on conversion of garages to living space, which works better for</p> <p>40. Agreeable to change</p>

Owner	Policy reference	Comment	T&H PC response
		<p>the future of infrastructure contributions, it might be prudent to keep it broad and say 'developer contributions', rather than 'S106 contributions'. This recommendation was made previously in relation to part 4) and is now reiterated in reference to Part 3) c).</p> <p>41. In relation to Part 3), Section 106 contributions can be secured (where conditions to achieve contribution are met) to achieve a good quality and accessible walking and cycling environment to meet the needs of the users of the development. This is reflected in the South Cambridgeshire Local Plan Policy TI/2 and is not disputed. What is disputed is the suggestion that contributions could be used "towards the initiatives identified above" which would include car parking courts. This may not be the intent of the policy, so for clarity suggest policy part 3) c) is reworded to remove "towards the initiatives identified above".</p>	<p>41. Use 'observed' rather than 'proven'?</p> <p>Agreed.</p>

Owner	Policy reference	Comment	T&H PC response
<p>South Cambridgeshire District Council</p>	<p>THP 13: Protecting and improving the rural footpath network and sustainable connections to neighbouring settlements</p>	<p>42. We continue to recommend that in part 1) ‘expected’ is amended to ‘encouraged’.</p> <p>43. There is uncertainty in relation to Part 2) and 3) of the policy- as although the intended routes to be improved are mapped there is not sufficient detail as to what specific route improvements are sought and how the improvements will be secured and delivered.</p> <p>44. We recommended that Paragraph 6.13.8, Maps 23 & 24 (including reference in policy part 2), and policy section part 3) should be moved to Chapter 7 as these routes are aspirational rather than deliverable through the planning system. The reasoning for this recommendation is:</p> <ul style="list-style-type: none"> ○ In relation to Policy part 2) the process of securing contributions towards improvements is covered under other legal agreements not possible via S106. This part of the policy is recommended to be amended to “ Where necessary to make a development proposal 	<p>42. Change as necessary</p> <p>43. We do not know what routes may become available between now and 2041</p> <p>44. Is all the county council policy on active travel routes only aspiration? (see comments from county council above). Is there not an action plan to improve active travel routes throughout the country? Reluctant to move to Chapter 7. This plan should be holistic, and not just for present planning regs.</p> <p>Is this proposed instead of clause 2 of THP 13?</p> <p>So there is no improvement, only maintenance in this policy, so Policy name needs to change to Protecting.... Rather than Protecting and Improving.... And removing any mention of</p>

Owner	Policy reference	Comment	T&H PC response
		<p>policy for aspired to routes as the land may not be within their control. Therefore, the requirement is potentially unreasonable when applied to all development proposals.</p>	
<p>South Cambridgeshire District Council</p>	<p>THP 14: Development proposals resulting in better links between the Heathfield and Thriplow communities.</p>	<p>45. We previously noted that part 2) and paragraph 6.14.4 were added to the presubmission plan as a requirement from the HRA but suggested that part 2) does not belong in this policy and is similar to THP 10. We reiterate our understanding of the reason that sub clause 2) has been added (as a requirement from the HRA of the NP) but we amend our previous comment and confirm that the council support the inclusion of part 2) of the policy (as is also the case for part e) of policy THP6) as any development linked to the rural economy or integrating the Heathfield and Thriplow communities will need to avoid negative impacts on hedgerows and disruption to bat flight lines. This will maintain the value of the Eversden and Wimpole Woods SAC by protecting its bat population.</p>	<p>45. Thank you. Agree.</p>

Owner	Policy reference	Comment	T&H PC response
South Cambridgeshire District Council	THP 15: Thriplow and Heathfield Infrastructure Priorities	<p>46. The Council understands that Policy THP 15 – Thriplow and Heathfield Infrastructure Priorities, has been added to the Submission plan as a direct result of comments made in our Pre-Submission response (see section below ‘Developer Contributions’). It is considered that this policy insertion has tried to respond to many of the Councils previous recommendations regarding developer contributions but do not consider that insertion of a new policy is the correct approach. We recommend that this policy is changed to be a community aspiration within Chapter 7.</p>	<p>46. See clause 67</p> <p>Policy 15 is to establish priorities – should it not remain as a policy? It is not just aspiration</p>
South Cambridgeshire District Council	General comments on the Thriplow and Heathfield Plan	<p>47. Our Pre-Submission response highlighted that a paragraph needs to be added in the Neighbourhood Plan to explain that the applicable neighbourhood area is the one designated under the old parish name. Also, the Neighbourhood Plan needs to explain that since its designation the parish has been re-named but the neighbourhood area remains in force. We continue to recommend adding this information into the introduction section of the Plan; this</p>	<p>47. Agree this should be added to the introduction: The applicable neighbourhood area is the one designated under the old parish name. Since its designation the parish has been re-named but the neighbourhood area remains in force.</p>


Owner	Policy reference	Comment	T&H PC response
		<p>recommendation is made irrespective of the wording included in paragraph 1.3 and 1.4 of the Thriplow and Heathfield Basic Conditions Statement.</p> <p>48. The front cover of the Neighbourhood Plan should say that the plan was prepared by Thriplow and Heathfield Parish Council (as the Parish Council are the 'qualifying body' to carry out a neighbourhood plan).</p> <p>49. Our Pre-Submission response noted that Paragraph 4.6.17 needed refinement and as no amendment has been made to the submission version our recommendation is re-iterated. Having a lot of glass on the floor does not necessarily disprove Highways England's designation of the road as being a safe road, because the existence of broken glass might not be the thing that Highways England measures to determine whether a road is safe or not. It is entirely valid to flag the community's concern at this road, but this doesn't necessarily disprove official statistics. Therefore, we would remove the below lines: "The survey also revealed that there had been many accidents</p>	<p>48. Add to front cover: the plan was prepared by Thriplow and Heathfield Parish Council</p> <p>49. The fears of residents about the risk at that junction are very real and well founded.</p> <p>Agree to removal of this part but the deterioration of safety caused by other lanes</p>

Owner	Policy reference	Comment	T&H PC response
		<p>here, perhaps not reportable and therefore the police and County Highways did not know about them, so they say that the junction is a safe junction. However, the amount of broken glass, etc. proves otherwise. Conversations held with local employees in the area further supports this assertion. Safety standards have been reduced further at this junction, recently, since the general lane widening process took place in 2018, at the expense of the exposed central lane for turning right.”</p> <p>50. Our Pre-Submission response noted that the pre-submission plan made no reference to consultation with businesses and as a requirement of the process, it should be addressed. It is noted that the Consultation Statement reflects the consultation undertaken with local businesses (pages 5, 6, 11 and 30), fulfilling the requirements. However, we would still suggest referencing the consultation undertaken with business in the plan by including this in the consultation summary section Chapter 3.</p>	<p>being widened, so central waiting zone is more dangerous is a real hazard which we are all aware of. This should be reported. So do not remove this: ‘Safety standards have been reduced further at this junction, recently, since the general lane widening process took place in 2018, at the expense of the exposed central lane for turning right.’</p> <p>50.Happy for this list to be included: Reg 14 list of stakeholders needs to be added to Reg 16 list here in 3.6</p>

Owner	Policy reference	Comment	T&H PC response
		<p>51. We note that a number of the policies could be amended to be positively worded as per the NPPF (2023) paragraph 16, b. For example, removing terms like ‘will not be supported’.</p> <p>52. Our Pre-Submission response commented on Paragraph 6.1.27 a), this section is now numbered 6.1.28 but no additional amendments have been made to the submission plan for this section. We re-iterate and expand our previous point.</p> <p>53. Clarity is needed about where hedging and trees would be acceptable and why. Are trees and hedges acceptable near to the path? A metre, 6 metres? Is the purpose of the offset to avoid crowding on the path? Perhaps a small diagram could be provided? Or wording added to explain where and why instead of or in conjunction with the current wording. Currently it is unclear as to what the plan is trying to control with this recommendation.</p> <p>54. In relation to paragraph 6.1.33 (c) – the council supports the maintaining of non-kick-about areas as wildflower meadows</p>	<p>51. Agree we should change any negative wording</p> <p>52. OK to change</p> <p>53. Where is this referred to? Agree all hedges must be far enough from path to ensure 2 person wide space is left clear on all footpaths in parish: 1.2 meters width. Any overgrowing is owners’ responsibility to cut back or be charged for someone else being paid for doing it.</p>

Owner	Policy reference	Comment	T&H PC response
		<p>with enhancement such as bug hotels and log-piles. However, we take the opportunity to make the parish aware that it is not just about reducing the cutting regime, other management and establishment processes will need to be undertaken otherwise these areas are more likely to become bramble and nettle scrub rather than wildflower grasslands.</p> <p>55. Paragraph 6.1.37 states ‘not identified in this plan’ but which plan is this?</p> <p>56. Paragraph 6.13.8 should be moved to Chapter 7 as it is aspirational rather than deliverable through the planning system.</p> <p>57. Our Pre-Submission response commented on Paragraph 6.14 – In relation to ‘Discussions are currently underway’ we suggested that it might be worth adding a date in to what is ‘current’, as this could be unclear, e.g. ‘in 2023 discussions...’. The Submission plan has been amended to ‘Discussions do take place’. We continue to recommend that clarity is provided as this change is still ambiguous, including specific</p>	<p>54. Yes include for necessary maintenance and management of all areas, to ensure safety for public use.</p> <p>55. The Thriplow and Heathfield Neighbourhood Plan 2024 to 2041</p> <p>56. Agree to move 6.13.8 to Chapter 7</p> <p>57. Better to omit this point. On more enquiry there has been no specific conversation reported to the PC. Possible alternative solutions are cats’ eyes and/or sensor-controlled lighting, though there was no agreement by the farmer or the PC who worked together to provide the original concrete path. Two places of flooding in low parts of the path beside the industrial area and ditch to the stream have become an issue in recent years.</p>

Owner	Policy reference	Comment	T&H PC response
<p>South Cambridgeshire District Council</p>	<p>Maps</p>	<p>detail of which discussions have informed views would make this point clearer.</p> <p>58. The Map image in Appendix 2 titled ‘Map 7: <i>Community and outdoor recreation facilities in the Parish</i>’ is a cropped version of Map 22: Existing rural routes for non-motorised users. Parish Wide. It is assumed that the image is correctly shown and the caption for the Map title/number should be amended to reflect this is showing Map 22.</p> <p>59. For Maps 3 and 4 – the individual annotated numbers for the 36 heritage assets on the map are dispersed quite randomly. It might help the reader if these were arranged with numbers going up 1, 2, 3 etc from left to right across the map or grouped in 3 clusters in Thriplow village.</p> <p>60. We recognise that amendments to Map 20 have been made and it now includes scale bar and wider red line site boundary. However, the map has a distorted resolution and should be improved.</p>	<p>58. Yes it is and caption should be amended to show this.</p> <p>59. Agree with what South Cambridgeshire District Council are proposing, and the council will work with us to prepare the necessary maps.</p> <p>60. The council will work with us to prepare the necessary maps.</p>

Owner	Policy reference	Comment	T&H PC response
		<p>61. In the referendum version of the Plan it will be important to ensure that all Map numbers are correct. Currently we are unsure that they are?</p> <p>62. Map 7 is different in the Plan and in Appendix 2 – Suggest re-number appendix as new map.</p>	 <p><small>Map 12: Thriplow Important Countryside Frontages (locally important views - see Policy TH5 - are also shown to illustrate how they interrelate)</small></p> <p><small>14MAY24 Neighbourhood Plan.docx Page 52 of 112</small></p> <p>This should be titled with reference to THP5 61/62. Map 7 in Appendix 2 is same as Map 22 in plan. It should be renumbered in Appendix 2. Inset can be added back into plan with Map 22?</p> <p>Map 23 shows existing circular walking route via the Drift, while Black Barn route though commonly used in Lock-down particularly, is not all designated public footpath, some being side of field and some being farm track (equivalent to footpath) so must remain as aspired to.</p> <p>Change name to remove 'Aspired to' in title of map Make into 'Existing Circular Routes'.</p>
<p>South Cambridgeshire District Council</p>	<p>Plan Period</p>	<p>63. Our Pre-Submission response noted that the Plan period is to 2041, whereas the adopted South Cambridgeshire Local Plan covers the period to 2031. The Council is preparing a new joint Local Plan which will extend into the 2040's but this</p>	<p>63. We can see this could lead to discrepancies but hope to be able to minimise these. This needs to be stated.</p>

Owner	Policy reference	Comment	T&H PC response
		<p>process is not expected to conclude until after the neighbourhood plan has been adopted. This may result in future differences between the two plans reflecting the context within which both plans are being prepared. We will nevertheless seek to minimise any potential policy conflicts through that process, but it is important to be aware of the possibility of such conflict at this stage.</p>	
<p>South Cambridgeshire District Council</p>	<p>Green Belt</p>	<p>64. Our Pre-Submission response noted that references to the designated green belt and its purpose are noticeably missing from much discussion in the draft Plan. The Green Belt provides substantial protection from development and, together with Local Plan policies regarding development outside the Development Frameworks, provides a strategic framework for the consideration of development proposals in the neighbourhood plan area. Perhaps in the Introduction, the Neighbourhood Plan group could add a subheader explaining how Green Belt policy protection is particularly important for this area, and reference the specific policies set out in Chapter 13 of the</p>	<p>64. Agree this should be added to Introduction as suggested to clarify matters.</p> <p>Add a sub header explaining how Green Belt policy protection is particularly important for this area, and reference the specific policies set out in Chapter 13 of the National Planning Policy Framework and Policy S/4 in South Cambridgeshire Local Plan.</p>

Owner	Policy reference	Comment	T&H PC response
		<p>National Planning Policy Framework and Policy S/4 in South Cambridgeshire Local Plan. Then when writing about a site in the Green Belt it would be sufficient to note that it is covered by the policy protection of the Green Belt. We continue to recommend a sub-headed section is added to the introduction which highlights the policy protections of Green Belt designation.</p>	
<p>South Cambridgeshire District Council</p>	<p>Developer Contributions</p>	<p>65. Our Pre-Submission response highlighted that South Cambridgeshire’s Local Plan, seeks S106 contributions in relation to Policies NH/5, SC/10, and TI/2.</p> <p>In Policy TI/8, the Plan sets out how S106 and Community Infrastructure Levy (CIL) will be used to pay for infrastructure on new developments. However, SCDC has chosen not to collect CIL so far. If and when SCDC adopts CIL then it will pass a proportion of the CIL receipts from the development to the parish council. The parish council must use the CIL receipts passed to it to support the development of the parish council’s area by funding the provision, improvement, replacement, operation or maintenance of infrastructure; or anything else that is concerned with</p>	

Owner	Policy reference	Comment	T&H PC response
		<p>addressing the demands that development places on the area. In such circumstances CIL monies could be used to achieve the objectives of THP-1. If the Council does not adopt CIL then infrastructure improvements will be funded through section 106 planning obligations. Unlike CIL these must be used solely to mitigate the impact of development and it is common principle that planning obligations should not be used solely to resolve existing deficiencies in infrastructure provision or to secure contributions to the achievement of wider planning objectives that are not necessary to allow consent to be given for a particular development.</p> <p>66. Our pre-Submission response noted that the implication for parishes is that the Infrastructure Levy would mean that funds wouldn't have to be tied to mitigating the impact of development (as they currently are with S106) and so potentially some of the funds from new development could be passed to parishes for identified spending targets that are not related to the development. Therefore, where the Plan identifies spending targets for developer</p>	<p>66. See clause 46. Hence policy 15 to establish priorities – should it not remain as a policy? It is not just aspiration and it allows for these possible changes.</p>

Owner	Policy reference	Comment	T&H PC response
		<p>contributions, it is suggested that the language remains broad enough so that they could be applied to different policy realities. We also suggested that given the low amount of funds which might come from new development, that it was worth considering asking for S106 funds on a more focused number of issues.</p> <p>67. Our Pre-Submission response noted that the Plan asks for S106 contributions to address a number of issues. SCDC pointed out in the previous comments on an early draft of the Plan that the Plan aspired to improve Heathfield using S106 money, but that S106 funds can only be spent in the near vicinity of the area (in-line with NPPF). This contradiction remains; in paragraph 5.3 of the Plan, it is stated that the Plan doesn't see Heathfield as an appropriate place for additional residential growth, however, if there is no new development, no new S106 funds will be accrued and therefore no improvements can be made. The Submission Plan has not been amended and the contradiction at Section 5.3 remains, we therefore continue to highlight this point.</p>	<p>67. We understand there is this contradiction in the Section 106 funding arrangement, but can still only say that new housing cannot be fitted into Heathfield with present Green Belt rules. And with attention to only the most sustainable sites being chosen for new houses. If Heathfield development provided amenities, then site could become sustainable there.</p>

Owner	Policy reference	Comment	T&H PC response
		<p>68. In relation to paragraph 6.1.26, c) - “Use section 106 funds and other locally available funding (e.g. CIL monies), to foster pride and sense of possibility to improve area”. We recommended that either this sentence is removed or amended to “Use section 106 funds and other locally available funding (e.g. CIL monies), to improve the public realm”. S106 is not capable of being objectively used to foster pride.</p>	<p>68. Agree on this change in wording.</p>

Other Representation Responses (September 2024)

Organisation	Policy reference	Comment	T&H PC Response
Anglian Water Services Ltd	n/a	No further comments to the Pre-submission version Reg 14.	None.
British Horse Society		<p>The BHS fully supports this proposal. Any new ROW created should be bridleways or byways. Local equestrians would like to see more of the ROW access available to them. Public money should be spent inclusively and include all non-motorised users. This includes money from Developers for new ROW.</p> <p>Whilst we support maintenance of PROW's, the work 'improvement' can become synonymous with changing a rural right of way to a tarmac path for cyclists. We would strongly oppose such changes. Any change of surface to the PROW now has to be applied for with the opportunity for the Cambridgeshire Local Access Forum to object.</p> <p>There is a paucity of rights of way in Thriplow:</p>	<p>We must balance the needs of all users. There being more cyclists than horse riders, a paved part of the route would benefit walkers, disabled and cyclists, while a soft surface also being desirable for nature and horses. We need both alongside of each other.</p>

Organisation	Policy reference	Comment	T&H PC Response
		<p>The Cambs ROWIP acknowledges that the bridleway network is disjointed, inadequate and in need of improvement. There is an opportunity to improve the bridleway network and thereby access for equestrians (it is acknowledged that there is a large number of equestrians in the parish) by upgrading footpaths to bridleways. We would ask that this is included on the wish list within the Plan.</p> <p>Improvement to the network can act as a catalyst to further improve the network for all users when opportunities become available.</p> <p>Another route to improve the PROW is by the inclusion of lost highways – historic public routes which have never been extinguished but are not currently on the Definitive Map. The BHS is aware of three such routes in Thriplow marked bright blue on the attached map: All need further investigation and if the evidence is found, DMMO applications need to be submitted. Currently, the BHS does not have the capacity to undertake these applications, but we would like them recorded on the NP as potential public rights of way of at least bridleway status.</p>	<p>Agreed. That is where connection to Icknield Way on other side of A505 would open up many walking routes. The A505 has cut off all of these for pedestrians and makes it difficult for cyclists too.</p> <p>Apart from Icknield Way, there is also an old route between Newton and the B1368 which we should have a footpath at least to connect to, to get to Newton in traffic free route. However farmer is reluctant to provide route along creek from our conservation meadow to it because of pheasant rearing area for his shooting crowd. Also the old permissive route in that direction from Sheralds Croft which has been cut off so he could get funds for it being a wildlife route</p>

Organisation	Policy reference	Comment	T&H PC Response
		<p>These routes should be investigated if they are threatened by any form of development.tc</p>	
<p>Cambridgeshire Constabulary</p>		<p>Planning policies and decisions should ensure that developments: create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.</p> <p>In relation to the design and layout of new developments including homes, commercial space, schools, hospitals, and sheltered accommodation we make the following comment:</p> <p>Security and Crime prevention measures should be considered at the earliest opportunity as an integral part of any initial design for a proposed development. It should incorporate the principles of ‘Secured by Design’ (SBD) and demonstrate how the development proposals address the following issues, to design out and reduce the incidence and fear of crime:</p>	<p>We agree with all the premises of Cambridge Constabulary.</p> <p>These principles are covered by a district wide policy, (SCDC Local Plan, Policy HQ/1), they do not need to be repeated here in the plan. They are particularly relevant to the acceptability of the design of the allocated Grainstore site.</p>

Organisation	Policy reference	Comment	T&H PC Response
		<ul style="list-style-type: none"> • Physical protection: Places that include necessary, well-designed security features. • Access and movement: Places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security. • Safe routes: Creating safe routes that are as straight as possible, wide, well lit, without hiding places and well-maintained and overlooked for security and provide a sense of security for all users. • Structure: Places that are structured so that different uses do not cause conflict. • Lighting: Ensuring appropriate and non-obtrusive lighting levels are achieved. • Private space: Creating a clear separation between public and private spaces, avoiding public routes next to back gardens. • Surveillance: Places where all publicly accessible spaces are overlooked. • Ownership: Places that promote a sense of ownership, respect, territorial responsibility, and community. • Activity: Places where the level of human activity is appropriate to the location reduces the risk of crime and always creates a sense of safety and territoriality. • Management and maintenance: Places that are designed with management and maintenance in mind, to discourage crime 	

Organisation	Policy reference	Comment	T&H PC Response
		<p>in the present and the future.</p> <p>In practice this means that Secured by Design status for new developments can be achieved through careful design. Developers should, at an early stage, seek consultation and advice from the Police Designing out Crime Officers at Cambridgeshire Police Headquarters on designing out crime.</p> <p>It is recommended that “Secured by Design” forms part of the conditions of any proposed planning application or re-development.</p> <p>We would appreciate if the above could be taken into consideration.</p> <p>Full text: Thank you for the opportunity to comment on the “Thriplow and Heathfield Neighbourhood Plan”.</p> <p>Regarding Policy - we would like to refer you to the following and recommend these are included within the revised “Thriplow and Heathfield” Neighbourhood Plan:</p> <p>National Planning Policy Framework (NPPF) - Section 12 Paragraph 135 (f) which states: -</p>	

Organisation	Policy reference	Comment	T&H PC Response
		<p>Planning policies and decisions should ensure that developments: create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.</p> <p>In relation to the design and layout of new developments including homes, commercial space, schools, hospitals, and sheltered accommodation we make the following comment:</p> <p>Security and Crime prevention measures should be considered at the earliest opportunity as an integral part of any initial design for a proposed development. It should incorporate the principles of 'Secured by Design' (SBD) and demonstrate how the development proposals address the following issues, to design out and reduce the incidence and fear of crime:</p> <ul style="list-style-type: none"> • Physical protection: Places that include necessary, well-designed security features. • Access and movement: Places with well- 	

Organisation	Policy reference	Comment	T&H PC Response
		<p>defined routes, spaces and entrances that provide for convenient movement without compromising security.</p> <ul style="list-style-type: none"> • Safe routes: Creating safe routes that are as straight as possible, wide, well lit, without hiding places and well-maintained and overlooked for security and provide a sense of security for all users. • Structure: Places that are structured so that different uses do not cause conflict. • Lighting: Ensuring appropriate and non-obtrusive lighting levels are achieved. • Private space: Creating a clear separation between public and private spaces, avoiding public routes next to back gardens. • Surveillance: Places where all publicly accessible spaces are overlooked. • Ownership: Places that promote a sense of ownership, respect, territorial responsibility, and community. • Activity: Places where the level of human activity is appropriate to the location reduces the risk of crime and always creates a sense of safety and territoriality. • Management and maintenance: Places that are designed with management and maintenance in mind, to discourage crime in the present and the future. <p>In practice this means that Secured by</p>	

Organisation	Policy reference	Comment	T&H PC Response
		<p>Design status for new developments can be achieved through careful design. Developers should, at an early stage, seek consultation and advice from the Police Designing out Crime Officers at Cambridgeshire Police Headquarters on designing out crime.</p> <p>It is recommended that “Secured by Design” forms part of the conditions of any proposed planning application or re-development.</p> <p>We would appreciate if the above could be taken into consideration.</p>	
<p>Cambridgeshire County Council Transport Strategy Team</p>	<p>Issue 3: Transport and Connectivity</p>	<p>The County Council is undertaking a multi-modal transport study of the Royston to Granta Park area. The objectives of the study have a strong focus on the environment with improvements to active travel, public transport and safety. Measures to reduce carbon emissions from transport would also be a key part of the development and detail of schemes and measures in the next stage of work. Recommendations on further work to</p>	<p>Active and multi-modal travel routes very much supported in our rural isolated community.</p>

Organisation	Policy reference	Comment	T&H PC Response
		develop more detailed proposals are due to be reported to committee in the autumn.	
Cambridgeshire County Council Active Travel Team	Theme 2: Living village and sustainable development Objective 10: A safer less congested parish. Objective 11: The quality and quantity of our rural footpath network and interconnectivity with neighbouring settlements will be improved.	Access, via non-motorised (active travel) routes, to the surrounding countryside and neighbouring settlements will be improved, bringing with it, social, mental and physical health benefits. We support the vision that promotes active travel. We support two themes in Objective 10 and 11. The plan highlights existing active travel routes and aims to enhance and expand them.	Links across A505 to Icknield Way (Chrishall Grange) and towards Newton and Foxton are needed to make community cohesive again. Cars and highways have destroyed so much community cohesion by dominating the street ways.
Cambridgeshire County Council Active Travel Team	Policy THP 10 – Grain store site allocation	Is there enough space for pedestrian and cycling routes along Lodge Road and Fowlmere Road?	No but there should be. We understand County Council is responsible for footpaths as well as roads. We have never had any maintenance for footpaths, which desperately need to be made wide enough for people to pass each other without going

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	Part 3) Connectivity and permeability		<p>on road. Erosion and deterioration over time have made road safer to walk on than footpath all the way from School to Fowlmere. This is a big issue. Section 106 money may hopefully be able to combine with County Council for something to be done about this. Cars have been prioritised over active travel for the last 50 years. So sad.</p> <p>This is a definite need since regular bus routes go from Fowlmere and not Thriplow or Heathfield. So people have to walk to get to bus and to get to shop. There is not currently space: path away from road is only 400 wide. County Council should take on this responsibility? Or is it up to Section 106 funding from Grainstore development to improve cycle/walk ways?</p>
<p>Cambridgeshire County Council</p> <p>Active Travel Team</p>	Paragraph 6.12.6, page 90	Have options been considered for creating a school street to stop vehicle access to the front of school at drop off and pick up, making the road a safer place to walk, wheel and cycle. Off road parking could be negotiated in the pub and village hall car parks. Additional options could be creating	There has been discussion and development of a plan for enlarging school site with Thriplow Farm land behind school, being donated so that site for off road car park could be created. This is also part of Section 106 possible actions.

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		<p>a walking or cycling bus from Heathfield to reduce drop offs in cars.</p>	<p>Pub and hall car parks are very small and footpath from there is insufficient and unsafe.</p>
<p><u>Environment Agency</u></p>		<p>Ecology THP8 and THP9 Hoffer Brook</p> <p>We would ask that the neighbourhood plan strongly considers and incorporates making space for water and allowing the river and its tributaries to interact / connect with its floodplain. This will allow the river to undertake natural processes, such as the removal of silt from in-channel to the deposition of silt out of channel within the floodplain during high flows. By making space for water and the incorporation of nature-based solutions, this could potentially reduce the future requirement for maintenance, prevent deterioration of the river's health, and aid its resilience to climate change.</p> <p>We would recommend aligning restoration and protection measures with the CaBA Chalk Stream Restoration strategy – principally, the importance of restoring and enhancing all three aspects of the water environment - water quality, water quantity</p>	<p>All of these should be included in plan. Examiner can choose, so duplication is avoided.</p>

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		<p>and habitat. The strategy highlights the importance of action within the headwaters of chalk streams, and this neighbourhood plan could be an excellent opportunity to incorporate them. More information is available</p>	
<p>Environment Agency Environment Agency</p>		<p>Site Allocation: Policy THP10</p> <p>The Grainstore site allocation is located above a Principal Aquifer and 6.10.17 notes the possibility of contaminative historic use on the site. We would suggest that the final sentence is amended to remove “2023” – the planning application should be prepared in line with the current policy at the time of submission.</p> <p>A site investigation and risk assessment will be required for any planning application.</p> <p>The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Groundwater Protection guidance:</p>	<p>Agree to change to 2024 for planning application but generally to 2025 now. Since this plan will not be adopted until 2025 all dates need to be changed.</p>

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		https://www.gov.uk/government/collections/groundwater-protection	
Environment Agency		<p>Water Resources</p> <p>Being in one of the driest areas of the country, our environment has come under significant pressure from potable water demand. New developments should make a significant contribution towards reducing water demand and mitigate against the risk of deterioration to our rivers, groundwater and habitats from groundwater abstraction. We recommend you check the capacity of available water supplies with the water company, in line with the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.</p> <p>New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the</p>	

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		<p>adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.</p> <p>Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from underground strata (via borehole or well) will require an abstraction licence under the terms of the WaterEnd 3 Resources Act 1991. There is</p>	

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		<p>no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licensing strategies (CAMS process)</p> <p>https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process#east-anglia-(map-area-10)</p>	
<p>Forestry Commission</p>		<p>No resources to respond to individual plans.</p>	
<p>Highways England</p>		<p>...we have reviewed the document and note that the details set out within the document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.</p>	
<p>Historic England</p>		<p>We welcome the production of this neighbourhood plan. Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time.</p> <p>We are pleased to note that our previous</p>	

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		comments in response to Policy THP 10 have been taken into consideration.	
Linton Parish Council		The LPC do not have any comments to submit for the Neighbourhood Plan.	
National Grid		NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.	
Natural England		Natural England does not have any specific comments on this draft neighbourhood plan.	
Sport England		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	Is this significant? I think we have it covered?