

Cambridge City Council response to South Newnham Neighbourhood Plan Submission (Regulation 16) consultation

1. Having previously commented on the Pre-Submission (Regulation 14) draft South Newnham Neighbourhood Plan that was consulted on in July 2023, Cambridge City Council is taking the opportunity to comment further at the Submission (Regulation 16) consultation stage.
2. Cambridge City Council has worked with the South Newnham Neighbourhood Forum (SNNF) 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.
3. We note that the Submission version has been revised after considering the representations received during the Pre-Submission (Regulation 14) consultation. Cambridge City Council submitted 120 comments in our Pre-Submission response, most of which have been taken into account and have resulted in revisions to the Plan. We very much welcome the changes that have been made and consider the Plan to be much improved.
4. There have also been meetings with the South Newnham Neighbourhood Plan group to discuss the Plan as it has evolved and to support the Neighbourhood Forum in preparing the Submission version of the Plan.
5. The comments we now make now concentrate on matters that relate directly to whether, in our opinion, the South Newnham Neighbourhood Plan meets the Basic Conditions.

Maps and Figures

6. We thank the SNNF for working with us in preparing revised maps for the Plan to respond to our previous comments. We are pleased to see that these have been added to the Submission Version of the Plan, and that they are legible, and consistent in stylistic approach. We have noticed that there are a few errors on some of the policy maps, and we have identified the necessary corrections in the relevant section of our response. We have also included amended maps at Appendix A of this response.

Policy SNNP1: Protecting and Enhancing Biodiversity

7. Our Pre-Submission response suggested that the policy should be clear in defining which development proposals are required to protect or enhance biodiversity. It was suggested that wording was amended to include minor

developments upwards, and we continue to recommend that development proposals is defined.

8. Since the Pre-Submission consultation on the Plan, statutory requirements for BNG have been introduced. Given the requirements for development to deliver BNG, we are now uncertain as to how this policy adds to those statutory requirements, and therefore believe that the policy has been superseded.
9. Informal comments from November 2022, and our Pre-Submission response recommended that the policy clarified how 'increasing tree canopy coverage' could be achieved. We note that a reference to the Cambridge City Council Tree Strategy SPD has been added in the supporting text on page 31, but the policy would benefit from further explanation of how increased tree canopy coverage can be achieved. In meeting the statutory requirements of BNG, where off-site mitigation is necessary, contributions which lead to increased tree canopy and strengthened ecological corridor would be supported.
10. The policy wording has been amended to use the wording 'Species Rich and Protected Hedgerows', this is noted and positively reflects suggestions from our previous comments.

Policy SNNP2: Delivering Biodiversity Net Gain

11. It was recommended that the policy wording was amended to read 'All development proposals (except householder applications – see below)' to make it clear the development scale that the policy is applicable to.
12. We also recommended that the policy sets out when in the development process evidence and information is required from applicants. We note the SNNF's response in their Consultation Statement states that 'we do not think it is the role of the planning policy to specify at what stages specific evidence should be provided. We view this as part of the development management process which can be tailored for specific schemes and therefore made no change'. We continue to recommend that the policy sets out the requirement for applicants to provide robust evidence setting out how proposals will achieve BNG. The Council strongly encourages this evidence to be submitted alongside other planning application documents at the beginning of the development process. This also allows development management to implement the policy requirement, rather than having to tailor their guidance to developers on a case-by-case basis. The policy wording could also refer to exempt developments still being required to deliver ecological enhancements, such as the hedgehog holes and bird boxes. Such features are not included within statutory BNG and therefore rephrasing will help prevent any confusion.

Policy SNNP3: Reduce and Maintain Low Levels of Light Pollution

13. Our Pre-Submission response suggested that the policy refers to the use of unshielded white lights rather than the use of shielded yellow/orange lights that is being gradually phased out as the Guidance Note 8 referred to in paragraph 7.1.7 advises. We continue to encourage Policy SNNP3 to reflect the Guidance Note.
14. The Policy refers to the Green Infrastructure Network, but does not acknowledge that this is identified in Map 2. This should be rectified for clarity. We recommended that it should be considered whether there is a need to designate green areas for special protection within the Plan as the areas on Map 2 are already protected through the Green Belt policy in the Cambridge Local Plan.

Policy SNNP5: Protecting and Maintaining the Connectivity Network

15. Our Pre-Submission response suggested that it would be beneficial for Policy SNNP5 to recognise the role that good walking and cycling networks have in supporting active travel options and improving health and wellbeing. We recommended making reference to the modular user hierarchy identified in the Manual for Streets 1 (Table 3.2). We continue to recommend adding reference to this Manual as it is an essential part of justifying the policy.
16. Our Pre-Submission response recommended that it was not appropriate to include the Barton Road Cycle Path within the Plan as it is managed by County Highways. We note that the SNNF highlight in their Consultation Statement that the cycle path was strongly supported in the plan-making process due to the importance of the grass verges being maintained. Where works are carried out within maintained highway, planning consent is not required and therefore the policy cannot be applied. It is noted that other policies in the Plan, such as Policy 12 use the phrase 'unacceptable harm'. This wording could also be used in this policy.

Policy SNNP7: Protecting and Supporting Homes and Facilities for Older People

17. Our Pre-Submission response recommended that the policy should consider the needs of disabled people. Whilst we recognise that the policy has been amended to reflect the intent of the policy to focus on housing for older people, we continue to recommend including reference to the document 'Protecting and Supporting Homes and Facilities for Older people' as this contains relevant information regarding the needs of both older and disabled people.

18. Our Pre-Submission response suggested that it should be clear that any development proposal should be based on clear evidence of need. We note that the SNNF highlight in their Consultation Statement that this amendment is unnecessary, but we continue to recommend that clarity is provided.
19. We welcome the amendments to Map 4, as it is more legible to the user. The key provides LC for Lammas Court, but this is not identified on the map. An amended map that includes a reference to LC is included in Appendix A. We also recommended to have a separate map identifying the location of the Lammas Court.

Policy SNNP9: Improving the Energy Efficiency of Existing and New Buildings

20. Our Pre-Submission response questioned whether a sustainability statement is required for extensions. It was recommended that the policy wording was amended to specify the scale of the development and we continue to recommend that clarity is provided. The Cambridge Local Plan requires sustainability statement from 10 dwellings or above, seeking to make the requirement proportionate and where it will add value.
21. With regards to water efficiency, the requirements set out in policy SNNP9 for non-residential development are not consistent with adopted policy and would lead to less water efficient schemes than currently required via policy 28 of the Cambridge Local Plan. In requiring non-residential development to achieve the BREEAM excellent requirements for water efficiency, policy SNNP9 actually only requires the achievement of 1 Wat01 credit, which represents a 12.5% reduction in water use, whereas policy 28 requires 5 Wat01 credits or a 55% reduction in water use. As such it is recommended that policy SNNP9 be amended to read “New non-residential major development proposals should achieve 5 BREEAM Wat01 credits for water consumption as well as achieving the Wat04 credit for process water loads where applicable.” We suspect a reduction in water efficiency was not an intentional approach change, but if it was not changed it would depart from an important strategic policy of the adopted Local Plan, so should be amended.
22. For residential development, the policy requires more ambitious levels of water efficiency than the adopted Local Plan, requiring developers to aim for water use of 85 litres/person/day. This level of ambition is to be welcomed and is of a similar level to the emerging policy in the Greater Cambridge Local Plan (the First Proposals Plan included a level of 80 litres/person/day). A Written Ministerial Statement in December 2023 announced that building regulations are to be reviewed in Spring 2024 and that in the meantime water efficiency standards tighter than 110 litres per day are to be encouraged in areas of serious water stress. If new levels are included within amended building regulations, this will be a requirement of all new housing and a policy

in the Neighbourhood Plan and Local Plan may not be necessary. In the meantime, we suggest that 'strongly encourage' may be better wording than 'aim for'.

Policy SNNP10: Responding to Climate Change and the Risk of Local Flooding

23. Informal comments from November 2022 and our Pre-Submission response highlighted that the content of this policy is already covered by the Local Plan Policy 32 on Flood risk, and it was not clear what policy SNNP10 adds. We note that the SNNF highlight in their Consultation Statement that it is considered that the policy adds value to local and national policy, and that the policy is focussed on addressing surface water flood risk as opposed to fluvial flood risk. We again recommend that the policy content is already reflected in Policy 32 of the Local Plan on Flood risk that refers to surface run-off, prevention of flooding of properties, and the use of management and maintenance plans for development. Policy 31 of the Local Plan also refers to integrated water management and the water cycle, particularly the use of SuDS that Policy SNNP10 also refers to.
24. Reference to considering the latest Strategic Flood Risk Assessment is helpful. However, Flood maps are frequently updated, therefore the policy should also reference to looking at the last information published by the Environment Agency. Although the first paragraph of the policy has been amended to update the reference to the SFRA Report, our Pre-Submission response recommended that the policy needed to be clearer in the scale of development that requires a specific flood risk assessment, and whether other small scale developments or extensions are included. National planning policy also sets clear requirements for developers on when an FRA is required, including in consideration of all forms of flood risk including surface water, and it would appear necessary or appropriate for neighbourhood plans to depart from this. We note that the SNNF highlight in their Consultation Statement that the first paragraph is specific in that it applies to development proposals that involve new builds. The fourth line of the policy is missing a close bracket.
25. The policy states that all parking areas, drives and patios should be permeable paving. Private rear gardens usually fall outside the 'public impact' element that policy implements. In general, permeability is often achieved through either open graded tarmac which is prone to breaking apart over time, or small unit pavers which are placed over a sand base and may become uneven over time, particularly if weeds infiltrate the gaps. Ultimately, they require a higher level of maintenance and repair than a non-permeable surface and are therefore less preferred for small back garden patios than non-permeable solutions which can be positively drained in a planting bed lawn or soakaway.

Policy SNNP11: Protecting and Enhancing Local Character Through Design-led Development

26. Our Pre-Submission response recommended that part d) of the policy is already a requirement of Policy 31 of the Local Plan, therefore it does not need to be repeated. We continue to recommend that part d) is not required.

Policy SNNP12: Protecting Residential Amenity in South Newnham

27. Our Pre-Submission response highlighted that the majority of the policy is already covered in the adopted Local Plan so therefore does not need to be repeated. We note that reference has now been made to the Local Plan, and that the SNNF highlight in their Consultation Statement that it is important to the South Newnham area that the policy remains.
28. To align with Policy 58 of the Local Plan, our Pre-Submission response recommended that the reference to 'glass directly facing neighbours properties' is removed. Our recommendation still remains, as if there is planning harm either through visual impact or residential amenity then this may be reasonable, but if there is no planning harm it seems difficult to restrict and implement this part of the policy.

Policy SNNP13: Converting Existing Houses into More than One Separate Housing Unit

29. Our Pre-Submission response recommended that the wording 'to meet family needs' is removed as it is not clear how 'family' would be defined, and it would therefore be difficult to determine whether the subdivision was to support family needs. We note that the SNNF highlight in their Consultation Statement that the policy allows residents to understand that this policy is designed to facilitate the evolving family need, however, we still recommend that the policy is amended.
30. Where the policy states vegetated boundaries shall be retained or enhanced, the policy would be more flexible if it is amended to include 'whenever practicable'. Sometimes vegetation cannot be retained for unforeseen reasons without giving rise to unreasonable expenses. It is more practical to remove and replace with other high-quality treatments as mentioned within the policy or replanting.

Policy SNNP15: Conserving and Enhancing Existing Views and Street Scenes.

31. We recommend that the policy is amended to remove the sentence 'This means supporting development proposals subject to:' as the first sentence sets out the expectation of development proposals subject to points a) and b).

We therefore suggest that point a) is amended to reflect the change and read as ‘...and attractive gardens shall be retained’, and for point b) to read ‘...shall be protected or enhanced’.

32. It is further unclear what would demonstrate that “careful consideration” is in respect to the siting of bins and bike storage. The policy wording should be more positively worded as to where they should be located.

General comments on the South Newnham Neighbourhood Plan

39. The comments below are advisory to help improve certain elements of the Neighbourhood Plan, but they are not related to whether the Plan passes the Basic Conditions test. It is therefore at the discretion of the Neighbourhood Forum to decide whether to implement them or not as part of the natural updating required in the referendum version of the Plan.

40. Some section headers, policies and supporting text titles have full-stops at end, and others do not. We recommend that the style and formatting of the policies is consistent throughout the document and can be reviewed as part of the natural updating required in the referendum version of the Plan.

Vision Statement

41. It is suggested that for the vision statement, amendments are made to the bullet point statements in order to improve clarity and ensure that all the action points are not in mix tense. It is recommended that it is amended to read:

- To protect and enhance the biodiversity of our neighbourhood's natural environment using sustainable methods.
- To create a network of safe, car-free routes exists for walking and cycling that are in harmony with our environment.
- To create an energetic and dynamic economic and social infrastructure characterised by thriving retail and community facilities grounded in local enterprise which meet the day-to-day needs of residents.
- To provide a balanced supply of housing stock in a variety of typologies and architectural styles based on our distinctive local character which enhances our existing heritage assets, and which meets the needs of neighbourhood's residents at all stages of life.

7.1.1 Introduction / Context to Policy SNNP 1 – Protecting and Enhancing Biodiversity

42. Paragraph 7.1.1 references notable species, and provides general wildlife e.g., birds, fish, mammals. It is suggested that the policy introduction includes the specific species known to frequent the green corridor and that can be

influenced through land management. For example, the species could include: barbastelle bat, water voles, Barn Owl, Treecreeper, Butterwort, Swifts, Great crested newts, stag beetles.

43. Our Pre-Submission response recommended that the links to external webpages in paragraph 7.1.13 and throughout the plan are removed (whilst still referencing the source), as the documents may be superseded, and the links may be out of date.

7.2.3 Supporting text to assist with implementation of the policy

44. Paragraph 7.2.3 states that the policy designates six Local Green Spaces, but only five are listed in the policy. We previously had discussions with the SNNF about the potential designation of LGS6 at the Riverside Club, but the SNNF did not receive confirmation from the Cambridge University to include the green space in the Plan. We recommend that the supporting text is amended to remove reference to the sixth location. Map 2 also still has reference to LGS6. An amended map that removes LGS6 is included in Appendix A.

7.2.4 Community Action

45. We welcome the amendment to paragraph 7.2.4 that provides clarity as to the maintenance responsibility for the allocated Green Spaces. LGS6 and LGS9 have been re-designated as Local Community Spaces under Community Actions.

7.7.3 Supporting text to assist with implementation of this policy.

46. The supporting text to the policy includes further detail on the contents of sustainability statements, including a requirement for statements to include information on calculated space heating demand, energy use intensity and electricity generated by renewable energy. It is noted that the Neighbourhood Plan does not set a specific policy requirement related to this energy metric. Encouraging developments to consider these new energy metrics, which are in keeping with those used in the emerging Greater Cambridge Local Plan, is welcomed, although it may be helpful for the supporting text to reference possible methodologies that could be used to obtain these metrics, given they differ from the metrics used for Building Regulations compliance. For example, reference could be made to the CIBSE TM54 methodology or Passive House Planning Package (PHPP).

7.7.10 Supporting text to assist with implementation of this policy

47. On page 61, Character Area B, consider changing the sentence 'Barton Road has a preponderance of large architect-designed...' to 'Barton Road is

characterised by large two and three storey detached and semi-detached houses designed by (local?) architects. They feature on both side of the road and are set back...’.

7.7.17 Introduction/Context to Policy SNNP14 – Protecting the Character of Neighbourhood Garden Boundaries

48. The wording of the title in paragraph 7.7.17 is different to what is stated in the policy title in paragraph 7.7.18. It is recommended that paragraph 7.7.17 is amended to read: ‘Introduction/Context to Policy SNNP14 – Protecting and Enhancing the Character of Neighbourhood Garden Boundaries’.

Appendix A: Glossary of Terms and Abbreviations

41. It is recommended that a dash ‘ – ’ is added in the second column where an abbreviation is not present to support the use of screen readers accessibility requirements. Additionally, providing a header in the third column, such as ‘Definition’.

Appendix B: Heritage Assets in South Newnham Neighbourhood

42. It is recommended that for LGS 2 in the second column of the table on page 81, ‘the famous’ is removed from the sentence.
43. It is suggested that for LGS 3 in the first column, the title ‘LSG3’, is amended to read ‘LGS 3’. It is also recommended that column 4 of LGS 3 is amended to remove ‘wild’ from the sentence, so that the section reads ‘The space is a pocket of deciduous woodland with some Poplar trees.’
44. It is suggested that for LGS 4 in the first column, the title ‘LSG4’, is amended to read ‘LGS 4’.
45. The font text and sizes are different in the continuation of the table from page 81 to 82. It is recommended that this is amended to be the same font and size throughout.
46. For LGS5 in the table on page 82, it is suggested that the text also includes how the trees on the street contribute to the mitigation of heat island effect.