

South Cambridgeshire District Council response to Thriplow and Heathfield Neighbourhood Plan Regulation Submission Consultation – 5 August to 30 September 2024

1. South Cambridgeshire District Council previously commented on the Pre-Submission (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.
2. 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.
3. 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 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.
4. 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.
5. 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.

Policies Map

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 therefore continue to recommend this addition be included in the Referendum Plan.

Planning Policies

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 policies 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.
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 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?

Policy THP 1: Improving the character and quality of Heathfield

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.
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:
 - 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.

11. For policy part 2) we recommend that the following wording is added to the policy as 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).
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 Levy Regulations, such an Obligation "may only constitute a reason for granting planning permission for the development if the obligation is-
- a. (a)necessary to make the development acceptable in planning terms;
 - b. (b)directly related to the development; and
 - c. (c)fairly and reasonably related in scale and kind to the development."

Paragraph 5 of the Policy acknowledges this and, as such, the usefulness of paragraph 4 is questioned.

Policy THP 2: Provision of additional amenities in Heathfield

13. No amendments to the wording of this policy have been made since our pre-submission response, and our comments are therefore re-iterated:
- 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.
 - Also, our pre-Submission response commented that in relation to the policy part 2), whilst it appears the intention is to secure 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.
14. Policy part 1) states "strongly supported". It is recommended that 'strongly' is removed so this is amended to state "supported" only.

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.

Policy THP 3: Protecting and enhancing village character in Thriplow

16. The objective and policy aims continue to be supported.
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 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.

Policy THP 4: Important Countryside Frontages in Thriplow village

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.
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 '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.

Policy THP 5: Parish-wide locally valued views

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 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.

Policy THP 6: Supporting the rural economy

- 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'.
- 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.
- 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'.
- 24.** Recommend removing part 1) b) 'Not damaging the residential environment or 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

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 to ensure they would not cause any adverse impacts.

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.

Policy THP 7: Heathfield Local Green Spaces

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."

Policy THP 8: Promoting nature recovery by protecting existing sites and features, increasing parish biodiversity and delivering biodiversity net gain.

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:
- 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 supporting text relating to this. Maybe this should be removed, as Policy THP 9 is more related to this?
- 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.
 - 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.

28. We support the overall policy as outline and take this opportunity to highlight that:

- 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 secure local offsite credits to meet the goals set out in this policy and,
- 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.

Policy THP 9: Protecting and enhancing the parish tributary feeding the Hoffer Brook

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.

30. Part 1) and Part 2) (please also refer to comment above) of Policy THP 9 need to 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.

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'.

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.
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)".

Policy THP 10: Grainstore site allocation

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 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.

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.
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 that these links will remain accessible in perpetuity of the plan being an adopted part of the development plan.

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).

Policy THP 11: Rural exception sites in Thriplow

37. No comment.

Policy THP 12: Improving parking provision and improving road safety in Thriplow and Heathfield

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 unsightly and restrict road widths for emergency and service vehicles.
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'.
40. We also noted in our Pre-Submission response that given the uncertainty about 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).
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".

Policy THP 13: Protecting and improving the rural footpath network and sustainable connections to neighbouring settlements

42. We continue to recommend that in part 1) 'expected' is amended to 'encouraged'.
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.
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:
- 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 acceptable and where directly and fairly and reasonably related in scale and kind to the development, contributions towards improvements to existing networks (on Maps 21, 22) will be sought."
 - Parts of the mapped network (2 footpaths) are permissive rather than part of the public rights of way network, and as such offer little value in terms of achieving the policy objective. In relation to public highways, we would like to highlight that agreements which include obligations relating to highways sections 38 and 278 of the Highways Act 1980 may apply (these sections govern how land can be adopted by the Local Highway Authority as public highway maintainable at the public expense (s38), or secure monies for works to the existing highway or allow the developer to procure such works itself). As such, we consider that it may not be possible for a developer to deliver Part 3) of the 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.

Policy THP 14: Development proposals resulting in better links between the Heathfield and Thriplow communities.

- 45.** We previously noted that part 2) and paragraph 6.14.4 were added to the pre-submission 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.

Policy THP 15: Thriplow and Heathfield Infrastructure Priorities

- 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.

General comments on the Thriplow and Heathfield Plan

- 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 recommendation is made irrespective of the wording included in paragraph 1.3 and 1.4 of the Thriplow and Heathfield Basic Conditions Statement.
- 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).
- 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 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."

- 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.
- 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'.
- 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.
- 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.
- 54.** In relation to paragraph 6.1.33 (c) – the council supports the maintaining of non-kick-about areas as wildflower meadows 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.

- 55.** Paragraph 6.1.37 states 'not identified in this plan' but which plan is this?
- 56.** Paragraph 6.13.8 should be moved to Chapter 7 as it is aspirational rather than deliverable through the planning system.
- 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 detail of which discussions have informed views would make this point clearer.

Maps

58. The Map image in Appendix 2 titled 'Map 7: *Community and outdoor recreation facilities in the Parish*' 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.
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.
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.
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?
62. Map 7 is different in the Plan and in Appendix 2 – Suggest re-number appendix as new map.

Plan Period

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 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.

Green Belt

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 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. 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.

Developer Contributions

- 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. 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 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.
- 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 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.
- 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.

- 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.