

# **South Cambridgeshire District Council response to Harston Neighbourhood Plan Regulation 16 Submission Consultation- 9 January 2025- 20 February 2025**

1. South Cambridgeshire District Council (SCDC) is taking the opportunity to comment on the Submission version of the Harston Neighbourhood Plan. The District Council previously commented on the Pre-Submission (Regulation 14) draft of the plan that was consulted on in June 2024.
2. SCDC has worked with Harston 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 Harston Neighbourhood Plan has been revised after considering the representations received during the Pre-Submission (Regulation 14) consultation. SCDC submitted a number of comments in our Pre-submission response, some of which have been taken into account. We welcome the changes that have been made.
4. There have also been meetings with Harston Neighbourhood Plan Working Group to discuss the plan as it has evolved and to support the Working Group in preparing the Submission version of the Plan.
5. The comments we now make concentrate on matters that relate directly to whether, in our opinion, the Harston Neighbourhood Plan meets the Basic Conditions.

## **Updated National Planning Policy Framework (NPPF)**

6. Since the submission of this plan on 11 December 2024, a revised National Planning Policy Framework (NPPF) has been published. As per paragraph 239 of the NPPF December 2024, the revised framework will only apply to a

neighbourhood plan proposal submitted from 12 March 2025. Therefore, the December 2023 NPPF will continue to apply to this submission. Nevertheless, it should be evaluated whether general reference to the NPPF within the supporting text and policies throughout the plan should be updated to reflect any changes in the December 2024 NPPF. It would also be appropriate to include text at the beginning of the Plan to note that it was examined against the December 2023 NPPF.

### **Policy HAR 1: New development and design**

7. In the Boundary Treatment section, we recommend that the final sentence “Inappropriate boundary treatment, such as tall brick walls and tall fencing fronting the street ...” is deleted, as it is not specific in terms of the definition of tall, and it is likely to be dependent on the context and location of the dwelling.
8. As raised in our pre-submission comments, clause 5 overlaps with the requirements of Local Plan Policies HQ/1 and SC/10, and therefore it is not considered necessary for this policy to repeat standards for amenity spaces, overlooking and environmental impacts. If clause 5 is to remain, it is recommended to replace the wording from “a good standard of amenity” to “high-quality amenity spaces”. We also recommended that, for clause 5 a) of the policy, amendments to the wording are made to state: “Avoid overlooking, overshadowing, loss of daylight and harmful impacts on private residential amenity spaces”. This is to ensure that proposals coming forward have adequate and high-quality residential amenity spaces.

### **Policy HAR 2: Protecting and enhancing important landscape features within the built-up environment**

9. We continue to recommend that, in clause 1 of the policy where reference is given to Map 2 for identifying ICF’s, this is changed to Map 5. The location of ICF’s is far clearer on Map 5 and for ease of use it is a quicker reference when viewing the policy.

10. For clause 1, we recommend that the wording of the third bullet point includes “or local landscape character”. Verges serve more than enriching the pedestrian experience as they provide visual amenity and sometimes historic depth. This modified wording covers these points.
11. For clause 2, we recommend that, to improve clarity, the wording “required to explain” is change to “required to submit a Landscape Compliance Statement which demonstrates how the development will retain or...”.
12. For clause 2, it is recommended that the first bullet point removes reference to “noise impacts”. The reason for this is due to the difficulty of proving landscape impact on noise without secondary features like embedded sound barrier fences or bunds.
13. For clause 3, it is recommended that the wording ‘future maintenance of features’ should be made more specific. Planning conditions will include the 5 year replacement clause and conditions can only be enforced for a period of 5 years. A Maintenance and Management Plan can provide a framework for how to maintain a space beyond 5 years but is not enforceable through planning.

### **Policy HAR 3: Protecting and enhancing the landscape character and setting in and around Harston Village**

14. In Paragraph 6.26 it is noted that the wording “well wooded village, snuggled below on flat land” as it is currently too anthropomorphic. We advise amending the wording of this section to “a well-wooded village, embedded into its landscape on an area of flat land”.
15. In the section that follows 6.34, where the plan details the five settlement fringe areas as defined in the HLCA (2024), although some of the landscape features identified refer to a map, for example, “Rectory Farm (see Map 8)”, we recommend that reference is included to the other maps that identify the landscape features from the settlement fringe areas.

16. Whilst we acknowledge that the important views as identified on Map 6 and evidenced in Appendix 4 are highly valued by the local residents, given the nature of several of the views, we would query whether all views identified are important enough to warrant designation. Appendix 4 sets out that the views are towards locally important heritage assets/distinctive buildings or towards distinctive land features, and that they are to affirm or reinforce a sense of place. The description of each view appears to explain the sense of place provided by each view, rather than the specific key or significant features that are contained within the view. The features identified for many views include locally ubiquitous features such as a feel of the countryside, tranquillity or being important for biodiversity, which are already protected by adopted Local Plan Policies such as NH/2 (protecting and enhancing landscape character) and NH/4 (biodiversity) along with other parts of HAR 3 (village gateways and settlement fringe areas). Only a small number of views identify specific key or significant features, such as within View M where it states 'This wide, long view looks south gently rising across large open arable farmland towards Rowley's Hill in the distance with its distinctive small group of trees.' The relatively low threshold for designation has resulted in significant areas outside of the development framework boundary of Harston being included within the frame of a proposed important view, and therefore we question whether this policy meets the basic conditions of having regard to national policies and contributing to the achievement of sustainable development. Additionally, as recognised in Appendix 4, a number of views are from Important Countryside Frontages (ICF), such as Views A and J, and the ICF designation already provides protection to these areas of countryside from any development proposals that would compromise its purpose as an ICF. It should also be recognised that the Neighbourhood Plan only applies to the Neighbourhood Area and cannot be used when making decisions outside the area. As such, the impact of a view into a neighbouring parish from the Neighbourhood Area cannot be considered when making decisions on planning applications within those parishes.

17. Clause 3 sets out that any development within one of the important views will be expected to take opportunities to enhance the view, however this is an unrealistic requirement as there is no way of determining whether or not a view has been

enhanced by a development. We suggest that clause 3 is removed as clause 2 of the policy already requires any development proposals to “respect and not adversely impact” the important views within and from the settlement.

#### **Policy HAR 4: Conserving and enhancing heritage assets in Harston**

18. Whilst clause 1 is informative, an amendment is recommended to make it more prescriptive: “developers should consult the list of local heritage assets, described in more detail in Appendix 3 of this plan, in addition to consulting the Local Authority maps for heritage assets”.
19. Clauses 3 and 4 refer to assessing the harm of a development on the setting of a non-designated heritage asset. Paragraph 206 of the December 2023 NPPF states that “any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification” and paragraph 209 states that “the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application”. As such, consideration of the impact on the setting of a non-designated heritage asset is not required. We therefore suggest that clause 3 should be amended to delete the reference to non-designated heritage assets and that in clause 4 the reference to the setting of a non-designated heritage asset should be removed, so that the policy meets the basic conditions of having regard to national policies.
20. It is recommended that Map 24 (within Appendix 3), which shows the locations of the non-designated heritage assets (NDHAs), is also included in the main body of the text alongside Policy HAR 4 rather than just within Appendix 3. This will allow for an easier cross referencing when viewing the list of NDHAs in the policy.

#### **Policy HAR 5: Preserving the special character of Harston’s historic core**

21. In paragraph 6.47 background information on how the Historic Core area is referred to in both the Harston Design Guidance Codes (HDG&C) and the Harston Landscape Character Appraisal (HLCA). Reference is given in this

section to how the Historic Core in the HCLA 2024 is referred to as CA2. In the HCLA 2024 the CA2 area is made up of two areas CA2a 'Old Core' and CA2b 'Old Railway area'. We recommend that for clarity this paragraph states that the Historic Core (CA2) is made up of CA2a and CA2b. We also recommend that a reference is made in the paragraph to Map 4 so that users can identify where the 'Historic Core' containing areas CA2a and CA2b is. Additionally, paragraph 6.48 gives context to what the character area CA2a is made up of, we recommend that the same should be included for CA2b.

### **Policy HAR 6: Button End**

22. We recommend that clause 5 is removed as it will likely lead to some confusion when applied. The current wording of this section suggests that if you propose the use of less vehicle movements than the existing use then it will be supported regardless of its use. The risk is that if someone proposes an inappropriate use, but it results in less vehicle movements, the planning application could be supported.

23. For clause 1 where it states, "should be of a modest scale, low density" it is recommended that the wording is amended to read "contextual scale and density suitable to the setting".

24. In paragraph 6.59, we note that the reference to the Public Rights of Way "116/13" is incorrect, as it should be "116/3".

### **Policy HAR 7: Harston Local Green Spaces**

25. For clause 2, we recommend that for clarity and consistency with national policy that the wording is amended to read: "Development on these sites should be consistent with national policy for Green Belts".

### **Policy HAR 8: Improving open space provision in Harston**

26. Clause 2 states that the "Land shown on Map 14 is safeguarded for future informal open space provision...". Our pre-submission response asked whether

the owners of the Gravel Pits had been consulted in relation to designating the land as informal open space. In the consultation statement, the response states that the “Site been abandoned for 70 years. Tried to ascertain ownership locally but no success and site not registered. PC to hopefully take over as common land with a management committee.” We acknowledge the aim to safeguard the land for informal open space provision, but suggest that clause 2 is amended to read “Proposals that safeguard the land shown on Map 14 for informal open space to serve local community needs will be supported”.

### **Policy HAR 9: Protecting and enhancing Harston’s wider landscape character**

27. We continue to advise that the Plan only references the protection of locally important views in one policy. As currently drafted clauses 3 and 4 of this policy (HAR 9) are repeating what has already been addressed in Policy HAR 3. We therefore recommend that these clauses are removed from Policy HAR 9.

### **Policy HAR 10: Protecting and enhancing biodiversity in Harston parish**

28. It is recommended that clause 6 is amended to include “unless otherwise agreed” before “in accordance with”. Stating that BNG must be in accordance with the British Standard is too prescriptive and could become outdated in the near future or superseded.

29. Although reference has been made to foraging and commuting bats in clause 3, we continue to recommend that reference is made to [the Bats and Artificial Lighting at Night Guidance Note \(2023\)](#) within the policy, as included in our pre-submission comments.

### **Policy HAR 11: Delivering sustainable design and construction in Harston**

30. The overall thrust of the policy is welcomed, as is the inclusion of reference to encouraging developers of non-residential schemes to go beyond current local plan policies relating to water efficiency. Concerns were raised in our pre-submission comments about the policy requirement for all development to provide a sustainability statement being overly onerous, notably for householder

extensions. The policy still requires the submission of a sustainability statement for householder extensions requiring planning permission, and we suggest that this is overly onerous and not in accordance with the adopted Local Plan and national planning policy. It is recommended that householder extensions are not required to submit a sustainability statement.

### **Policy HAR 12: Supporting renewable infrastructure in Harston Parish**

31. In our pre-submission comments, we queried the inclusion of clause 2 of the policy and recommended that the reference to community led development is removed so that the policy supports renewable or low carbon energy projects for all development proposals. We continue to recommend that reference to community led development is removed from this clause.
  
32. The policy provides in principle support in clause 1 for standalone renewable energy infrastructure projects that will “facilitate low carbon living in Harston and deliver community benefits (such as direct provision of zero or low carbon energy)”. While this is welcomed, all renewable energy projects must be considered on their own merits, regardless of whether they directly support low carbon living in Harston, in line with the requirements of national policy. It is therefore recommended that “or other infrastructure that will facilitate low carbon living in Harston community and deliver community benefits (such as direct provision of zero or low carbon energy” is removed from clause 1.

### **Policy HAR 13: Managing flood risk in Harston parish**

33. Paragraphs 3.17-3.20 of the Neighbourhood Plan refer to flood risk in Harston. The Environment Agency is undertaking a project to update its national flood risk information for flooding and coastal erosion, and a new flood map for planning (NaFRA2) is due to be published in March 2025. We suggest that the Neighbourhood Plan should highlight that the latest flood risk information will need to be viewed on the Environment Agency’s website.



## **Policy HAR 14: Supporting rural exception sites to meet Harston's affordable housing needs**

34. Whilst the source has been updated in Paragraph 10.8, we continue to recommend that the full source "SCDC Housing Allocations Team, [via Home-Link](#)" is added to the plan including the link provided.
35. We note that the policy in clause 1 refers to 'small-scale' whereas both the NPPF and adopted Local Plan Policy H/11 refer to 'small sites', and therefore we suggest that the wording should be amended to 'small sites' to provide consistency between the terms in the Neighbourhood Plan, NPPF and Local Plan.

## **Policy HAR 15: Housing mix, including 'First Homes' in Harston**

36. We acknowledge that changes have been made to the policy in relation to First Homes, to reflect changes in national planning policy and guidance. However, the policy still allows for 'First Homes' to be delivered, and sets out a specific discount of 50%. Our district wide evidence, set out in the [Greater Cambridge First Homes Interim Position Statement](#) and its accompanying issues and options paper, states that a discount of beyond 30% is not considered to be viable. Therefore, unless the Neighbourhood Plan has additional evidence to support that a discount of 50% is viable or deliverable we suggest that the policy requirement needs to be amended. It is recommended that clause 2 part b, bullet point 2 states "Where first homes are included in the mix it should be delivered at 50% discount, unless evidence is provided that a lower discount is needed for the purpose of delivering a viable product and it is evidenced that the products would be affordable to eligible local households."
37. For clause 2, part a, we note that there may be some issues of practicality when seeking to implement the policy. For example, on a development of 4 dwellings, at least 60% 3 bedroom dwellings, would require 3 of the dwellings to be 3 bedrooms (i.e. 75%), but then that means that only 1 of the dwellings would be 2 bedrooms, which is only 25% rather than the required 36%. We recommend that the wording is amended to allow some flexibility in implementation, for example

by including 'approximately'. We also note that clause 1 of the policy refers to prioritising delivery of 1, 2 and 3 bedrooms dwellings, but clause 2, part a does not mention 1 bedroom dwellings.

### **Policy HAR 16: Managing the movement of people and vehicles arising from new development**

38. To ensure consistency with national planning policy, it is recommended that clause 1 uses the phrase 'severe significant impacts' to provide clarity that it can be consistently applied in decision making and to achieve the outcome being sought.
39. For clause 3, in our pre-submission comments, we queried the reference to 'increasing visibility at the exit points of driveways' and highlighted that development should only be required to meet recognised visibility standards and that is unreasonable to go beyond such standards. We continue to suggest that the policy wording is amended to provide this clarification.

### **Policy HAR 17: Recognising and mitigating the impacts of development on traffic movements in Church Street**

40. In our pre-submission response, for clause 1, we raised concerns about the policy needing to be reasonable in the approach to movement on Church Street and how developers would be able to demonstrate no additional movements given that this road links to Haslingfield. Whilst the clause has been amended, the policy is still restrictive where it states "this will apply to all proposals requiring highways access on to Church Street as well as proposals in other parts of the plan area (such as Button End)...", it is recommended that the policy is amended to read "This will apply to all proposals that require access on to Church Street in the Plan area".
41. It is recommended that for clause 2 of Policy HAR 17 an "and" is included between the two mitigation measures that have been stated to ensure that both have to be taken into account when there is a development proposal.

### **Policy HAR 20: Telephone exchange site**

42. We note the amendments made to this policy, as previously the policy aimed to safeguard the telephone exchange site for parking without consulting the landowner directly, which would have likely led to the intentions of the policy being unachievable and unviable. We acknowledge that the Parish Council has attempted several times to contact the landowner, as indicated in the Consultation Statement. However, we still have concerns regarding the intentions of this policy, and what it means when considering planning applications for any proposed development on this site that is not a public car park. The removal of telephone exchange equipment is understood to be costly, and the site is located within the development framework boundary of Harston. Therefore if the redevelopment of the site for housing was proposed, which is likely to be a more viable proposal than a car park, would this be contrary to the policy? It may be more appropriate for the policy to be a Community Aspiration.

### **Policy HAR 21: Connecting our village through an improved network of rural routes**

43. We acknowledge that the legibility of Map 17 has improved and welcome the addition of a footnote which clarifies how the bridleway is part of the eastern spur off the proposed Haslingfield Greenway.

44. In paragraph 12.12 it refers to routes “vii)” and “viii)”. We recommended that for clarity, these references are amended to routes 7 and 8 for consistency with the policy and paragraph 12.11.

### **Policy HAR 22: Delivering active travel infrastructure as part of new development**

45. In our pre-submission comments, we identified that Policy SC/4 from the Local Plan should be referenced in the section “applicable policies from South Cambridgeshire 2018 Local Plan”. We still suggest that this reference is added.

### **Policy HAR 27: Land at Station Road (SIG Roofing site)**

46. We note the addition of paragraphs 14.9-14.11 which provide a clear and concise outline of the details of the site with reference to the previous planning application and take into consideration the deliverability of the site. In light of the comments from East West Rail, there is some additional uncertainty regarding whether the site could be developed for housing if East West Rail did require some of the land within this allocation. Part of the site is currently the subject of a [safeguarding direction](#). We suggest that policy should include a reference to this direction, as this may result in some of the land within the current allocation being unsuitable and unavailable for residential uses, and any proposal for this site will need to take into account the likely relationship between the proposed use and the nearby railway line.

### **Policy HAR 28: Land at 131 High Street**

47. As highlighted in our pre-submission comments, this site is partially within the development framework boundary and partially outside of the development framework boundary. This is illustrated on Map 21, however in paragraph 14.12 it states that the site is within the development framework boundary. Paragraph 14.12 should be corrected.

48. Clause 1 states that 'development is expected to come forward in the medium term (approximately 2030 onwards)', and we are unclear why this is specifically included in the policy and what the reasoning is for the site not coming forward in the short term. We would suggest that information on the likely delivery timings of the site is included in the supporting text, as has been done in paragraph 14.10 for Policy HAR 27.

49. Clause 2, second bullet point, requires promotion of 'circular walking routes of at least 2.7km, dedicated dogs off lead areas and dog waste bins' to mitigate for recreational pressure on SACs and Ramsar sites. It is unclear where this requirement comes from and exactly what any proposed development on this site will need to do to meet this requirement.

## **Appendices**

50. In Appendix 3, it gives further detail on the NDHA's with a description of significance. Overall, the methodology and criteria used to identify the NDHA's is in line with Historic England's Advice. However, for some of the sites it appears that the criteria has been applied liberally (in particular Social and Communal Value, and in places Aesthetic Interest/Architectural Interest and Rarity, for example, Village Hall). This section also needs to be reviewed for consistency of formatting, for example, Harston Mill appears to have been nominated for Age criteria twice – this presumably is meant to be Ar – Archaeological interest.

## **Additional Comments**

51. We would be supportive of the Parish setting up a group to consider Community Energy and such a project may be eligible for funding from SCDC.