

Gamlingay Neighbourhood Plan



Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or

neighbourhood.planning@greatercambridgeplanning.org

All comments **must** be received by 5pm on Tuesday 23 November 2021.

Data Protection

We will treat your data in accordance with our Privacy Notices:

www.scams.gov.uk/planning-policy-privacy-notice/. Information will be used by South Cambridgeshire District Council solely in relation to the Gamlingay Neighbourhood Plan.

Please note that all responses will be available for public inspection and cannot be treated as confidential. Representations, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed of future stages of the Gamlingay Neighbourhood Plan?

Please tick: Yes No

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:	N/A	Agent's name:	██████████
Name of organisation: (if applicable)	Cambridgeshire County Council	Name of Agent's organisation: (if applicable)	Carter Jonas LLP
Address:	Box OCT 1228 Shire Hall Castle Hill Cambridge	Agent's Address:	One Station Square, Cambridge
Postcode:	CB3 0AP	Postcode:	CB1 2GA
Email:	c/o Agent	Email:	██
Telephone:	c/o Agent	Telephone:	██████████
Signature:		Date:	19 November 2021

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representation number:

Part B – Your Response

What part of the Neighbourhood Plan do you have comments on?

Policy or Paragraph Number (please state)	Objective 1, Objective 4, Paragraphs 4.12 and 4.13, Paragraph 4.60, Paragraph 4.62, Policy GAM6, Policy GAM7 and Neighbourhood Plan Maps (4, 7, 9, 10 and 11), Policy GAM8, Policy GAM10 and Appendix 3, Policy GAM11, Appendix 2, General.
Do you Support, Object or have Comments? (Please tick)	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Object <input type="checkbox"/> Comment

Reason for Support, Object or Comment:

Please give details to explain why you support, object or have comments on the Neighbourhood Plan. If you are commenting on more than one policy or paragraph, please make clear which parts of your response relate to each policy or paragraph

If you consider that the referendum boundary should be extended, please outline your reasons.

INTRODUCTION

Cambridgeshire County Council, as landowners of the former First School and Playing Fields, supports / objects / comments on the following policies and paragraphs in the Gamlingay Neighbourhood Plan:

- Objective 1 – Supports
- Objective 4 – Objects
- Paragraphs 4.12 and 4.13 – Supports
- Paragraph 4.60 – Objects
- Paragraph 4.62 – Comments
- Policy GAM6 – Objects
- Policy GAM7 and Neighbourhood Plan Maps (4, 7, 9, 10 and 11) – Objects

- Policy GAM8 – Objects
- Policy GAM10 and Appendix 3 – Objects
- Policy GAM11 – Objects
- Appendix 2 – Comments
- General – Comments

Representations made in respect of the above are set out below. Representations made at this stage are limited to whether or not the Neighbourhood Plan meets the basic conditions and other matters that the independent examiner is required to consider under Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) which is applied to neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act 2004. Representations may also address whether the referendum area should be extended beyond the neighbourhood area, and a case can be made for an oral hearing.

It is concluded that the Neighbourhood Plan does not meet basic conditions A, D and E:

- Condition A - having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order [or neighbourhood plan]
- Condition D - the making of the order [or neighbourhood plan] contributes to the achievement of sustainable development
- Condition E - the making of the order [or neighbourhood plan] is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

Therefore, that it should not proceed to referendum or be made without modification.

It is also requested that the examination include a public hearing, under Paragraph 9 of Schedule 4B to the Town and Country Planning Act 1990, to ensure Cambridgeshire County Council has a fair chance to put their case forward. It is important that the points set out in the representations below receive full consideration and that Local Plan is modified appropriately to address the concerns raised.

FORMER FIRST SCHOOL AND PLAYING FIELDS

Cambridgeshire County Council (CCC) are in the process of looking for a whole site solution for the former First School. Their priority is to secure a long-term, viable use. A detailed feasibility study of the site has not yet been carried out, but based on experience in the area, it is considered likely that a residential-led, mixed use proposal would provide the value needed to retain and convert existing buildings. The size and configuration of the buildings would appear to lend themselves well to conversion into smaller homes, and there may be an opportunity to use part of the site for community use, as part of a comprehensive scheme.

Whilst we understand the good intentions of the Neighbourhood Plan in respect of proposing the former First School buildings for education and community uses, the concern that CCC has, as landowner, is whether there is demand / committed interest for such uses, and whether such demand is viable in the long-term. No evidence from the Neighbourhood Plan process has been identified to support full use of the site for community purposes.

The policy priority for this site should be to ensure buildings are protected and re-used for an appropriate use (or mix of uses), and whilst this might start by encouraging community re-use as a policy preference, there should be flexibility within the wording to support alternative uses if a community use cannot be secured.

REPRESENTATIONS

OBJECTIVE 1: HOUSING GROWTH

SUPPORT

Objective 1 recognises the need for appropriate housing growth in Gamlingay including the need for smaller and adaptable homes. This is supported.

OBJECTIVE 4: COMMUNITY AMENITIES AND FACILITIES

OBJECT

The supporting text to Objective 4 advises that Policy GAM7 designates the former First School Playing Field as new Local Green Space with pedestrian access. It also advises that Policy GAM8 supports development of the former First School buildings for educational and community uses and safeguards the site for 10 years. Cambridgeshire County Council objects to Policies GAM7 and GAM8 under basic conditions A, D and E,

see representations submitted in respect of Policies GAM7 and GAM8 below. Thus, Cambridgeshire County Council also objects to the supporting text to Objective 4 under the same basic conditions.

PARAGRAPHS 4.12 and 4.13

SUPPORT

Paragraph 4.12 advises that the Bedfordshire Rural Communities Charity (BRCC) Housing Needs Survey Report (2018) indicates a particular demand for smaller 1-2-bedroom homes and bungalows in Gamlingay to meet the needs of single people requiring accommodation on their own, as well as older people seeking to downsize. Paragraph 4.13 recommends developers focus on less expensive, smaller, and adaptable 2 to 3-bedroom houses and bungalows. Cambridgeshire County Council supports the provision of smaller homes which could be explored as part of a mixed-use scheme at the former First School site.

PARAGRAPH 4.60

OBJECT

Paragraph 4.60 advises that there is a shortfall of places for care of children during their early years in Gamlingay. It goes on to state that the existing former First School buildings would provide an ideal location for pre-school care. Policy GAM8 is proposing the reuse of the buildings on the former First School site for educational and community purposes where a need (e.g. for pre-school provision, a new doctors' surgery or relocation of the Co-op) can be met.

Cambridgeshire County Council objects to Paragraph 4.60 under basic conditions A, D and E (see representations submitted in respect of Policy GAM8). Cambridgeshire County Council acknowledges its duty to provide pre-school places. However, while a detailed feasibility study of the site has not yet been carried out, based on experience in the area it is considered likely that a sole pre-school use would not be viable. Also, due to the size of the buildings multiple site occupants would be required. To produce an effective whole site solution, it is highly likely that a mixed use scheme will be required to support such facilities, however, this should not be restricted to education and community uses. Rather, greater flexibility should be provided to ensure a suitable viable scheme can be developed. This view was expressed by Cambridgeshire County Council as part of the Regulation 14 Consultation.

PARAGRAPH 4.62

COMMENT

The former First School field is private land with no public access. Access to the former First School field is only granted through private agreements with Cambridgeshire County Council.

GAM6 – COMMUNITY AMENITIES AND FACILITIES

OBJECT

Policy GAM6 states that the loss of amenities and facilities will be resisted unless it can be demonstrated that efforts have been made to secure their continued use and alternatives are provided. Cambridgeshire County Council objects to Policy GAM6 under basic Condition A as the policy is not considered clear and unambiguous as required under Paragraph 16(d) of the NPPF and Paragraph 041 (Ref. 41-041-20140306) of the NPPG. The policy does not define what falls within “amenities and facilities” for the purpose of the policy, or what an applicant is expected to demonstrate to show that “efforts have been made to secure their continued use”. Furthermore, it has not taken into account the existing level of provision within the settlement. In line with the Local Plan, it is suggested that the wording be updated to “village services and facilities, including village pubs, shops, post offices, banks and building societies, community buildings and meeting places, sports venues, cultural buildings, places of worship or health facilities, where such loss would cause an unacceptable reduction in the level of community or service provision in the locality”. This change in wording is also required to meet basic condition E (see below).

Policy GAM6 also does not meet basic condition E which requires general conformity with the strategic policies contained in the development plan. This includes Local Plan Policy SC/3: Protection of Village Services and Facilities which seeks to protect village services and facilities. However, as set out above, Policy GAM6 does not include the same definition of facilities and services as Policy SC/3. Furthermore, Policy SC/3 sets out clear guidance on what will be considered in determining the significance of the loss of a village service or facility:

- a) *“The established use of the premises and its existing and potential contribution to the social amenity of the local population;*
- b) *The presence of other village services and facilities which provide an alternative, with convenient access by good local public transport services, or by cycling or*

walking; and how these remaining uses will cope with displaced users; and any unacceptable impact of those alternative services or facilities;

- c) The future economic viability of the use including the results of marketing of the premises for a minimum of 12 months at a realistic price and in appropriate cases financial information.”*

Neighbourhood Plan Policy GAM6 does not provide this clarity which is considered important for the application of the policy. Policy GAM6, therefore, does not conform with Policy SC/3 of the Local Plan.

GAM7 – DESIGNATION OF THE FORMER FIRST SCHOOL FIELD, GREEN END AS A LOCAL GREEN SPACE (TL 23582 52417) AND NEIGHBOURHOOD PLAN MAPS OBJECT

Policy GAM7

Policy GAM7 designates the former First School Field as Local Green Space with pedestrian access. Cambridgeshire County Council objects to Policy GAM7 under basic Condition A as the policy is not realistic or deliverable. Paragraph 16(b) of the NPPF states that plans should “be prepared positively, in a way that is aspirational but deliverable”. This is repeated in Paragraph 005 (Ref. 41-005-20190509) of the NPPG which specifically covers neighbourhood plans. Paragraph 002 (Ref. 10-002-20190509) of the NPPG also states that “it is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies”.

The former First School Field is private land with no public access (including no public rights of way across the land). Access is only granted through private agreements with Cambridgeshire County Council. Cambridgeshire County Council, as landowner, clearly stated within their Regulation 14 consultation response that “access to the playfields will be granted, on permission only basis, to documented authorised users”. A Local Green Space designation does not confer any rights of public access over what exists at present (NPPG, Paragraph 017, Ref. 37-017-20140306).

Therefore, there is no public access and the inclusion of “with pedestrian access” is neither realistic nor deliverable. Consequently, Policy GAM7 is not appropriate and does not meet basic Condition A.

Cambridgeshire County Council also object to the boundary of the proposed Local Green Space designation which includes the Scouts Hut and car park. Having regard to national policies and advice contained in guidance, the inclusion of the Scouts Hut and car parking within the proposed Local Green Space designation is considered inappropriate and does not meet basic Condition A.

The purpose of Local Green Space designations is to provide special protection for green areas of particular importance to local communities (NPPF, Paragraph 101; NPPG, Paragraph 005, Ref. 37-005-20140306). It is not considered that the Scouts Hut or associated car park fall within the definition of “green areas” to which Local Green Spaces designations apply.

While the definition of green areas includes “land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis” NPPG, (Paragraph 013, Ref. 37-013-20140306), the Scouts Hut and car park comprise built development that does not read as part of the former First School Field green area. Rather, the Scouts Hut and car park form part of the built-up area including the former school. Therefore, they are considered to fall beyond the definition of a green area. Assets such as the Scouts Hut are covered under different areas of protection including through the existing Asset of Community Value (ACV) listing.

Neighbourhood Plan Maps

The following maps show the boundary to the proposed Local Green Space designation which includes the Scouts Hut and car park. This includes:

- Map 4: Landscape Setting
- Map 7: Key Policy Areas 1-12
- Map 9: Community Amenities and Facilities
- Map 10: Walking Cycling and Horse-Riding Routes
- Map 11: Gamlingay Wood – GAM12

As set out above, having regard to national policies and advice contained in guidance, the inclusion of the Scouts Hun and car parking within the proposed Local Green Space designation is considered inappropriate and does not meet basic Condition A.

GAM8 – REUSE OF THE FORMER FIRST SCHOOL BUILDINGS, GREEN END (TL 23647 52413)

OBJECT

Policy GAM8 proposes the reuse of the former First School buildings and new buildings for educational and community uses (e.g Use Classes a, b, e, f, g). Cambridgeshire County Council objects to Policy GAM8 under basic conditions A, D and E.

Condition A: Regard to national policies and advice

Policy GAM8 proposes educational and community uses (including Use Classes a, b, e, f, g) on the site. It is assumed the policy refers to Use Class **E** (a, b, e, f, g)) and, if so, this should be updated accordingly. Use Class E (a, b, e, f, g) includes:

- E(a) Display or retail sale of goods, other than hot food
- E(b) Sale of food and drink for consumption (mostly) on the premises
- E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
- E(f) Creche, day nursery or day centre (not including a residential use)
- E(g) Uses which can be carried out in a residential area without detriment to its amenity:
 - E(g)(i) Offices to carry out any operational or administrative functions,
 - E(g)(ii) Research and development of products or processes
 - E(g)(iii) Industrial processes

The use classes above are not consistent with the “educational or community uses” as stated in the policy. The list of use classes includes other uses such as retail and employment and excludes Use Class F (local community and learning). Paragraph 16(d) of the NPPF and Paragraph 041 (Ref. 41-041-20140306) of the NPPG require that policies be clear and unambiguous, so that it is obvious how the decision maker should apply the policy when determining planning applications and so that policy is applied consistently. However, the current wording of Policy GAM8 is neither clear nor unambiguous in respect of what uses would be supported on the site.

Policy GAM8 also states that the former First School buildings and new buildings on the brownfield site should be safeguarded for ten years. However, there is no reference to, or justification of, the ten-year period within the supporting text. Paragraph 31 of the NPPF also requires the preparation and review of all policies to be underpinned by relevant and

up-to-date evidence. It advises that this should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned and should take into account relevant market signals. Furthermore, specific to neighbourhood planning, Paragraph 041 (Ref. 41-041-20140306) of the NPPG advises that policies should be supported by appropriate evidence and Paragraph 040 (Rev. 41-040-20160211) states that “proportionate, robust evidence should support the choices made and the approach taken” and that the evidence should be “drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan”.

The ten-year safeguarding period set out in Policy GAM8 has not been supported by robust evidence nor considered relevant market signals. Furthermore, the intention or rationale behind the set period has not been explained. It does not appear as though any viability work has been carried out, and the possibility of the Grade II listed building remaining unoccupied for a period of ten years if a compatible and viable scheme cannot be found does not appear to have been considered. The prospect of the site remaining unoccupied for ten years will not be of benefit to the Cambridgeshire County Council (landowner), the local community, or the preservation of the heritage asset.

Policy GAM8 also restricts the development options available for the former First School without first considering the viability of the options specified. Paragraph 190 of the NPPF states that plans should “set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats”. The strategy should take into account (amongst other things) “the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation”.

As set out above, the former First School is Grade II listed and it does not appear as though any work has been carried out on the viability of the development options specified in Policy GAM8. Cambridgeshire County Council, as landowner, are investigating a whole site solution for the redevelopment / disposal of the site. While investigations into alternative uses are still ongoing, it is envisaged that a mixed-use scheme would be the best solution for the site which may include some uses not specified in Policy GAM8. In its current wording, Policy GAM8 does not allow sufficient flexibility for the best whole site solution to be developed. It is not in the interest of Cambridgeshire County Council, the local community, or the preservation of the heritage asset for the site to remain unoccupied for a period of ten years if a compatible and viable scheme cannot be found.

All capital raised from the disposal of the site will also be reinvested into front line services across the county.

Therefore, having regard to national policies and advice contained in guidance, Policy GAM8 is not appropriate and does not meet basic condition A because:

1. The wording of the policy is neither clear nor unambiguous
2. The safeguarding of the site for ten years has not been supported by robust evidence nor taken into account relevant market signals
3. The restriction of potential uses on the site does not provide a positive strategy for the conservation and enjoyment of the historic environment

Condition D: Sustainability

Policy GAM8 restricts possible uses on the site with insufficient flexibility and “safeguards” the former First School buildings and new buildings for a period of ten-years. However, “safeguarding” the former First School buildings and new buildings for this period does not meet the requirement for sustainable development. The former First School is Grade II listed (listing reference 1271139) and it does not appear as though any work has been carried out on viability. The layout and configuration of the building(s) are unlikely to make for an easy conversion. The possibility of the listed asset remaining unoccupied for a period of ten years if a compatible and viable scheme cannot be found does not contribute to the achievement of sustainable development (NPPF, Paragraph 7), nor meet the sustainability objectives (economic, social, or environmental) which should be delivered through the preparation and implementation of plans and the application of the policies in the NPPF (NPPF, Paragraphs 8 and 9). While unoccupied the asset would sit as an unutilised resource; it would not generate any income, it would not benefit the local community, and the upkeep of the heritage asset would be affected.

Condition E: General conformity with the strategic policies contained in the development plan

Condition E requires general conformity with the strategic policies contained in the development plan. Appendix E of the Local Plan identifies the “Strategic Policies” in the South Cambridgeshire Local Plan. Those considered particularly relevant in this case are:

- NH/14: Heritage Assets
- NH/15: Heritage Assets and Adapting to Climate Change

- SC/3: Protection of Village Services and Facilities

Policy NH/14 supports the retention and enhancement of the heritage assets and NH/15 encourages and supports the re-use of historic buildings as a sustainable resource. However, as set out above, the restriction of possible uses and the ten year safeguarding period set out in Policy GAM8 mean the Grade II listed former First School may remain unoccupied for a period of ten years if a compatible and viable scheme cannot be found. This does not conform with strategic policies NH/14 or NH/15. Greater flexibility is therefore required in respect of the potential use of the heritage asset.

Policy SC/3: Protection of Village Services and Facilities seeks to protect villages services and facilities including community buildings such as the former First School. However, Policy SC/3 also recognises the need for flexibility stating that the following matters will be considered in determining the significance of the loss of a village service or facility:

- d) *“The established use of the premises and its existing and potential contribution to the social amenity of the local population;*
- e) *The presence of other village services and facilities which provide an alternative, with convenient access by good local public transport services, or by cycling or walking; and how these remaining uses will cope with displaced users; and any unacceptable impact of those alternative services or facilities;*
- f) *The future economic viability of the use including the results of marketing of the premises for a minimum of 12 months at a realistic price and in appropriate cases financial information.”*

By not including similar measures to allow flexibility, Policy GAM8 conflicts with Policy SC/3 of the Local Plan. The need for flexibility is even more apparent in this case owing to the existing configuration of the building, its age, and its listed status, which mean that a significant amount of investment in the building is likely to be required. No justification or rationale for the non-conformity with Policy SC/3 has been provided within the Neighbourhood Plan. Furthermore, as set out above, no evidence has been provided to justify the “safeguarding” period which has the potential to see the valuable heritage asset and existing resource remain unoccupied for a significant period if a viable scheme cannot be found.

GAM10 – CONTRIBUTIONS TOWARDS PROVIDING NEW INFRASTRUCTURE FOR WALKING, CYCLING AND HORSE RIDING AND APPENDIX 3: DEVELOPER CONTRIBUTIONS

OBJECT

Policy GAM10 requires new residential and business units to contribute towards the provision and maintenance of new paths for the purpose of cycling, walking and horse riding between the village, hamlets, employment sites and neighbouring villages. It sets out the level of contribution required. Appendix 3 sets out further information on developer contributions.

Cambridgeshire County Council objects to Policy GAM10 as it is not considered to meet basic Condition A. Paragraph 005 (Reference ID: 41-005-20190509) and Paragraph 001 (Reference ID: 10-001-20190509) of the NPPG advise respectively that:

“Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy.”

“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106...”

Insufficient evidence has been provided on how the proposed contributions relate to the strategic policies within the Local Plan or how they will impact the deliverability of the neighbourhood plan, local plan, or spatial development strategy. Furthermore, a proportionate assessment of viability has not been provided. The lack of evidence also conflicts with Paragraph 31 of the NPPF and Paragraph 041 (Ref. 41-041-20140306) of the NPPG.

The policy is also ambiguous as the term “business developments” has not been defined so it is not clear what it is intended to include. Paragraph 16(d) of the NPPF and

Paragraph 041 (Ref. 41-041-20140306) of the NPPG require policies be clear and unambiguous, so that it is obvious how the decision maker should apply them.

It should be noted that the former First School Playing Field was not identified as recreation space within the Council's Recreation and Open Space Study (July 2013) nor within the Services and Facilities Study (March 2014).

GAM11 – LANDSCAPE AND NATURAL ENVIRONMENT

OBJECT

Policy GAM11 advises that green spaces within developments should be consolidated to create a network of publicly accessible formal and informal green spaces – green infrastructures – for sport and recreation. Cambridgeshire County Council objects to Policy GAM11 on the grounds that it is not deliverable (as required under Paragraph 16(b) of the NPPF) as not all green space within developments will necessarily be publicly accessible. Therefore, in its current wording the policy does not meet basic condition A.

It is suggested that the words “public open” be inserted at the start of the sentence so that it reads:

“Public open green space within developments should be consolidated to create a network of publicly accessible formal and informal green spaces – green infrastructures – for sport and recreation.”

APPENDIX 2: GAMLINGAY'S GREEN INFRASTRUCTURE

COMMENTS

Appendix 2 identifies sites of sport, recreation and amenity value where residents can come together both informally and where community events are held. The Gamlingay First School playing fields, Green End (0.8 ha) (Asset of Community Value-ACV) is included within the list.

The former First School Playing Field is private land with no public access (including no public rights of way across the land). Access is only granted through private agreements with Cambridgeshire County Council. While the land was previously used for sports and recreation associated with the school use, the school use has now ceased owing to the relocation of the school.

GENERAL

COMMENTS

Reference to the NPPF needs to be updated to the 2021 version.

The conservation area boundary does not exactly follow that drawn on the Local Plan Policy Map for Gamlingay.

Summary of Comments:

If your comments are longer than 100 words, please summarise the main issues raised.

Cambridgeshire County Council, as landowners of the former First School and Playing Fields, supports / objects / comments on the following policies and paragraphs in the Gamlingay Neighbourhood Plan as they do not meet all of the basic conditions set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

A bullet point summary of the main issues raised is provided below:

- **Objective 1 – Supports:**

- The objective recognises the need for appropriate housing growth in Gamlingay including then need for smaller and adaptable home. This is supported.

- **Objective 4 – Objects:**

- Objects under basic conditions A, D and E:
 - The objective acknowledges Policies GAM7 and GAM8. Cambridgeshire County Council objects to these policies under basic conditions A, D and E (see representations submitted in respect of the said policies below); the objection also applies to Objective 4.

- **Paragraphs 4.12 and 4.13 – Supports**

- Paragraph 4.12 indicates a particular demand for smaller 1-2-bedroom homes and bungalows in Gamlingay and Paragraph 4.13 recommends developers focus on less expensive, smaller, and adaptable 2 to 3-bedroom houses and bungalows. Cambridgeshire County Council supports the provision of smaller homes which could be explored as part of a mixed-use scheme at the former First School site.

- **Paragraph 4.60 – Objects**

- Objects under basic condition A, D and E:
 - Paragraph 4.60 refers to Policy GAM8. Cambridgeshire County Council objects to Policy GAM8 under basic conditions A, D and E (see

representations submitted in respect of the said policies below); the objection also applies to Paragraph 4.60. To produce an effective whole site solution for the former First School buildings it is highly likely that a mixed use scheme will be required. Thus, greater flexibility on the potential future uses is required to ensure a suitable viable scheme can be developed.

- **Paragraph 4.62 – Comments**

- It should be noted that the former First School field is private land with no public access. Access to the former First School field is only granted through private agreements with Cambridgeshire County Council.

- **Policy GAM6 – Objects:**

- Objects under basic condition A:
 - The policy does not define what falls within “amenities and facilities” for the purpose of the policy, or what an applicant is expected to demonstrate to show that “efforts have been made to secure their continued use”. The policy is therefore unclear and ambiguous. It is recommended that the wording be updated to “village services and facilities” in line with the Local Plan to provide more clarity.
- Objects under basic condition E:
 - Policy SC/3 sets out clear guidance on what will be considered in determining the significance of the loss of a village service or facility. Policy GAM6 does not provide a similar level of clarity.

- **Policy GAM7 and Neighbourhood Plan Maps (4, 7, 9, 10 and 11) – Objects:**

- Objects under basic condition A:
 - The policy is not realistic or deliverable as the former First School Field is private land with no public access. It is recommended that the inclusion of “with pedestrian access” be removed from the policy.
 - The Scouts Hut and car park do not fall within the definition of “green areas” to which Local Green Space designations apply. It is recommended that the Scouts Hut and car park be removed from the proposed designation.

- **Policy GAM8 – Objects:**

- Objects under basic condition A:
 - The policy is unclear and ambiguous as the use classes set out are not consistent with the description of “educational or community uses” stated in the policy.

- The safeguarding period of ten years has not been adequately supported by robust up-to-date evidence nor have relevant market signals been considered. Furthermore, the intention or rationale behind the set period has not been explained. It does not appear as though any viability work has been carried, and the possibility of the Grade II listed building remaining unoccupied if a compatible and viable scheme cannot be found does not appear to have been considered.
 - The policy does not set a positive strategy for the conservation and enjoyment of the historic environment which includes putting heritage assets to a viable use consistent with their conservation. The policy restricts the development options available on the site without first having considered the viability of the options specified.
 - Objects under basic condition D:
 - The possibility of the listed asset remaining unoccupied for a period of ten years (the “safeguarding” period) if a compatible and viable scheme cannot be found does not contribute to the achievement of sustainable development. It does not appear as though any work has been carried out on viability and the layout and configuration of the building(s), together with the listed status, are unlikely to make for an easy conversion.
 - Objects under basic condition E:
 - NH/14: Heritage Assets and NH/15: Heritage Assets and Adapting to Climate Change - the restriction of the possible uses and the ten year safeguarding period mean the Grade II listed former First School may remain unoccupied for ten years if a compatible and viable scheme cannot be found. This does not conform with strategic policies NH/14 or NH/15. Greater flexibility is therefore required in respect of the potential use of the heritage asset.
 - SC/3: Protection of Village Services and Facilities - while seeking to protect villages services and facilities, Policy SC/3 also recognises the need for flexibility. By not including similar measures to allow flexibility, Policy GAM8 conflicts with Policy SC/3 of the Local Plan. The need for flexibility is even more apparent in this case owing to the existing configuration of the building, its age, and its listed status. No justification or rationale for the non-conformity with Policy SC/3 or for the safeguarding period has been provided.

- **Policy GAM10 and Appendix 3 – Objects**

- Objects under condition A:
 - Insufficient evidence has been provided on how the proposed contributions relate to the strategic policies within the Local Plan or how they will impact the deliverability of the neighbourhood plan, local plan, or spatial development strategy. Furthermore, a proportionate assessment of viability has not been provided.
 - “Business developments” has not been defined so it is not clear what it is intended to include, therefore, the policy is unclear and ambiguous.

- **Policy GAM11 – Objects:**

- Objects under condition A:
 - The policy is not deliverable because not all green space within developments will necessarily be publicly accessible. It is recommended that the words “public open” be inserted at the start of the policy.

- **Appendix 2 – Comments**

- The former First School Playing Field is private land with no public access, access is only granted through private agreements with Cambridgeshire County Council.

- **General – Comments**

- Reference to the NPPF should be updated to the 2021 version
- The conservation area boundary should be updated to follow that drawn on the Local Plan Policy Map for Gamlingay.

Completed forms must be received by 5pm on 23 November 2021 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
Cambourne Business Park, Cambourne,
Cambridge, CB23 6EA