

Appendix 1

South Cambridgeshire District Council's response to the consultation on the submission version of the West Wickham Neighbourhood Plan

1. South Cambridge District Council (SCDC) is taking the opportunity, through the Regulation 16 consultation, to comment further on the West Wickham Neighbourhood Plan.
2. SCDC has worked with West Wickham Parish Council (PC) during the preparation of the plan. We appreciate the hard work that has gone into getting their neighbourhood plan this far along the process. There have been some meetings with the neighbourhood plan team to discuss the plan as it has evolved. This plan made good progress during the lockdown period.
3. SCDC notes that the Submission version of the West Wickham Neighbourhood Plan has been revised since the Regulation 14 consultation. SCDC submitted a number of comments during this earlier consultation the majority of which have been taken on board during the review which we welcome.
4. The comments we make now concentrate on matters that relate directly to whether, in our opinion, the Plan meets the Basic Conditions.

Comments on the draft Plan in plan order

5. The following comments are made working our way through the document.
6. Figure 8 West Wickham policy map overview – The wording of the allotment gardens and the recreation ground on the map are barely visible because of the dark green local green space background layer. It would help future users of the Plan who are not familiar with the parish to be able to read these locations. We see this as a minor amendment outside the Basic Conditions.

Policy WWK/1: Settlement patterns and identity

7. This policy and its supporting text have been much revised since the Regulation 14 consultation which we welcome as this makes for a clearer policy with the justification set out in the supporting text illustrated by photographs and diagrams.
8. Bullet d – We had previously suggested additional wording to this policy which we still consider would help in its implementation – ‘...not adversely impact the key features of locally distinctive and locally valued views....’

Policy WWK/2: Built environment characteristics

9. A full description has been added to the supporting text to this policy about the different character areas within the parish. We support this inclusion.
10. However, our historic environment team remains of the view that the Platts Farm site is sufficiently prominent in the core section of the village that it merits a more specific reference in the description of Character Area 1.
11. Second part of policy - We welcome the references to new boundary treatments and to paving, which are absolutely consistent with policy NH/14 of the local plan and the objective of protecting the historic environment. However, we consider that the wording of the policy could place greater emphasis on the specific issue of the impact inappropriate kerbstones, kerb heights and footways might have on the settings of listed buildings and the character of the conservation area. It would have been helpful to have more explanation within the supporting text on this issue.
12. For clarity we suggest that the following wording is added to the final sentence of the policy ‘...incorporating where necessary, appropriate boundary treatment to mitigate detracting impacts on to the street scene and public realm.’

Policy WWK/3 Heritage Assets

13. We suggest that the policy refers to preserve or enhance as is used in the NPPF.
14. Our historic environment team considers that the reference to non-designated assets should not limit the application of the policy to those identified on Policy Map 4. Other assets might be identified in the future and the policy would have greater strength if it left open the possibility of other buildings or features being considered to be NDHAs.
15. The justification for the NDHA’s identified would probably benefit from being still more robust. Some of the assets have been given explanations of their architectural or historic significance, but for others the comment is still only a statement of age and function.
16. Policy Map 4 – This identifies the non-designated heritage assets in the parish which are numbered. We consider that it may be helpful for future users of the plan if the key included a list of these assets.
17. The Roman Road is included in the policy, but it is not shown on Policy Map 4. The extent of the feature is shown in Policy Map 8- this could be referenced in this policy to help those not familiar with the ‘road’.

Policy WWK/4: Local Green Space

18. We welcome that Policy Map 6 now clearly shows the boundary of the Local Green Space and that safeguarded for future development of the village hall.

Policy WWK/7: Biodiversity and green infrastructure

19. Paragraph 4.76 – The council’s ecologist has indicated that species rich and /or important hedgerows can be referred to as Habitats of Principal Importance under S41 of the Natural Environment and Rural Communities Act 2006. We see this as a minor amendment outside the Basic Conditions.
20. We welcome that the terms used in the earlier version of this policy have now been defined in the glossary. As regards ‘notable trees’ the council’s ecologist has checked the Ancient Trees Inventory and there do not appear to be any veteran trees logged in West Wickham as is suggested in paragraph 4.77.
21. Paragraph 4.81 - Within this supporting text mention could be made to the new Environment Act 2021 which makes 10% biodiversity net gain mandatory on all developments from November 2023. In February 2022 SCDC adopted the Biodiversity Supplementary Planning Document and it would be useful to reference this in the Plan to provide support to the delivery of Policy WWK/7
22. Second section of policy – We suggest that in the first sentence ‘them’ is changed to the identified asset or similar for clarity. Also, within this sentence the term ‘substantially outweigh’ should be defined so that a development management officer would know how to determine a planning application using this policy.

Policy WWK/8: Access to the countryside

23. We suggest that there needs to be an indication of what scale of development proposals would need to take account of this policy – as currently written it would expect all development including extensions. Should it be only those above a certain size? We would also suggest that it should perhaps relate to the development of new dwellings because they would result in potential increased usage.

Policy WWK/9: Delivering smaller homes in West Wickham

24. Figure 34 shows the number of bedrooms in dwellings sold within the parish indicating there were none sold that were one bedroomed. As there are no one bedroomed dwellings in the parish as is explained in paragraph 4.93 we consider that the graph could highlight that such dwellings have not been available as an option. We see this as a matter that could be addressed in the Plan without impacting on the Basic Conditions.
25. We would suggest in the second part of the policy that rather than ‘... through reference to...’ the following words are added ‘... through having regard to...’.

Policy WWK/11: The Village Hall site

26. It is noted that Policy WWK/11 covers the area identified in red on Policy Map 11 and that it does not include the existing recreation space which is designated Local Green Space in Policy WWK/4. On this basis it is presumed that criterion a) does not apply? Further, does "adjacent to the existing Village Hall" mean only that area identified in red?

27. Bullet (a) - If the open space is retained or re-provided elsewhere this would be good but if it is to be only enhanced could this not lead to the loss of this space? What enhancement would be acceptable?

Glossary

28. We had previously suggested that the definition of affordable housing within the glossary be expanded so that it more closely aligns with that in the NPPF which covers a wider range of tenure types, as well as the changes to Government Planning Policy requiring First Homes as part of the delivery of affordable housing. The definition has remained in a shortened view.