

South Cambridgeshire District Council response to Pampisford Neighbourhood Plan Regulation 16 Submission Consultation

1. South Cambridgeshire District Council (SCDC) is taking the opportunity to comment further on the Submission version (Regulation 16) of the Pampisford Neighbourhood Plan. The District Council previously commented on the Pre-Submission (Regulation 14) draft of the plan that was consulted on in November 2023.
2. SCDC has worked with Pampisford 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 Pampisford Neighbourhood Plan has been revised after considering the representations received during the Pre-Submission (Regulation 14) consultation. SCDC submitted 123 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 Pampisford Neighbourhood Plan group to discuss the plan as it has evolved and to support Pampisford 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 Pampisford Neighbourhood Plan meets the Basic Conditions.

Policy PAM1 – Residential development

6. We consider that the first part of Policy PAM1 is not clear in terms of the delivery of homes in accordance with Part M4 (2) of the Building Regulations. SCDC Local Plan Policy H/9 (Housing Mix) asks for 5% of homes on sites of 20 dwellings or more to be built to the accessible and adaptable M4(2) standard.
7. The opening sentence of the policy states that “Infill residential development within the development framework will be supported in line with Local Plan policy...” but the second bullet point states that this means “building homes to the Building Regulations accessible and adaptable dwellings M4 (2) standard unless it can be demonstrated in a full financial appraisal that the application of the standard would make the development unviable.”

8. It is unclear from the wording of the bullet point whether all new homes should be built to M4 (2) standard. If this is the case, then it would exceed rather than be “in line with” the Local Plan policy.
9. In relation to achieving homes built to M4 (3) standard, it seems that this is an aspiration rather than a requirement of an infill plot development given the opening “will be supported” statement? As such, proposals that otherwise meet the requirement of Policy PAM1 could not be refused if they were not built to M4 (3) standard.
10. In the final paragraph we note that proposals that meet the very exceptional circumstances of Local Plan Policy S/11 will only be supported where affordable housing is delivered as part of the proposal. Such an approach is contrary to paragraph 65 of the NPPF (December 2023) which states “Provision of affordable housing should not be sought for residential developments that are not major developments,”

Policy PAM2 – Rural exceptions housing in Pampisford

11. Our Pre-Submission response suggested that Policy PAM2 appeared quite similar to Policy H/11 (Rural Exception Site Affordable Housing) from the adopted South Cambridgeshire Local Plan (2018), so it could be removed unless it was demonstrated that there was a distinct difference that would apply to Pampisford. We continue to question whether Policy PAM2 is needed in addition to the adopted Local Plan policy.

Policy PAM3 – Maintaining and enhancing landscape character in Pampisford

12. There is a close relationship between this policy and Policy PAM11, and it is questioned whether the reference to trees is required here given the more thorough criteria of PAM11. In the case of this policy, inclusion of the wording ‘retain or enhance existing landscape features’ does not cover instances where trees have little amenity value and would potentially need to be removed to facilitate a development, such as instances where trees are of poor quality/ diseased and/or would have limited visual impact if removed. We suggest adding wording to give greater clarity to the policy. In addition, clarity on what a ‘generous and comprehensive landscape buffer’ is required, ensuring that it is being proportionate to the development and what scale of development this would apply to. For example, would this include householder (extensions)?

13. In supporting text at paragraph 6.3.9 is a list of design code numbering and we recommend it would be beneficial to include wording to give more explanation from the design code as to what those sections says.

Policy PAM4 – London Road street scene improvement area

14. Our Pre-Submission response recommended that perhaps more photos would help illustrate the problems with the street scene. Other aspects of the street scenes to consider could be footway surface quality, widths of streets and footways, how well maintained they are, green verges, signage, barriers, less safe or less visible sections, and poor street lighting. Is it the case that the Brewery Road/London Road village gateway is satisfactory in terms of these other aspects as a point of contrast with the problems identified?

We still consider that the Plan content on this matter is rather slight. We would expect more commentary and analysis to justify the policy, explaining what is so incoherent and unattractive about the area. Perhaps more photos would help illustrate the problems with the street scene or going into detail about different sections along the London Street / Brewery Road.

Perhaps the policy context and rationale could consider other aspects of the street scenes e.g. footway surface quality, widths of streets and footways, how well maintained are they, green verges, too much signage and clutter, barriers / obstacles, less safe / less visible sections, lack of street trees or poor street lighting, although it must be acknowledged that some aspects of change to the street scene do not require planning consent as if they are in the highway they are deemed as permitted development.

15. Our Pre-Submission response stated that Policy PAM4 does not refer to the type or scale of development where contributions are sought. The policy might not be suitable for all types and scales of development. We recommended that reference was made to the type or scale of development where contributions are sought within the Policy wording. We still consider that this clarity is required in the policy.
16. Our Pre-Submission response stated Cambridgeshire County Council had concerns about the deliverability of this policy and to seek information about who owned the pathway and hedges next to the road. Was it the businesses or Cambridgeshire County Council? Then, depending on the owner, change the policy emphasis to ensure that the policy is strong enough to capture contributions efficiently. For example, if the County Council owns the hedges and pathway, then it would make sense to emphasise using contributions to improve the 'public realm' of that area. However, if the hedges and pathways are owned by the businesses, with little publicly owned land, then the policy needs to change to place the onus upon the businesses to improve the land

next to the road as part of any future proposals. The neighbourhood plan group was encouraged to contact the County Council to find out about the extent of the adopted highway to see if the County Council owns all road and the land next to it.

We note that Policy PAM4 has been amended but we continue to recommend that in PAM4 policy wording is given further clarity to ensure any appropriate development may be required to deliver or make financial contributions, as currently the policy wording in the final paragraph is highlighting public realm alone.

17. Our Pre-Submission response recommends that if there are requests for public realm or play equipment improvements, these improvements should be inclusive for users and if they have guardians with them. We continue to recommend this approach.

Policy PAM5 – Local Green Spaces

18. We recommend the additional wording to PAM5 policy after Local Green Space sites to include “Development proposals within the designated local green spaces will only be supported in very special circumstances.” to ensure it aligns with national policy requirements.

Policy PAM7 – Pampisford Village allotments

19. Our Pre-Submission response recommended that policy PAM7 could also be refined to reflect adopted South Cambridgeshire Local Plan policy SC/8, e.g., allotments would be replaced by an area of equivalent or better quantity and quality and in a suitable location. We still consider this clarity should be provided in Policy PAM7.
20. We also suggest that for clarity, an additional sentence should be added to the supporting text to confirm that although the community would like to see further use of the village hall (which is included as a community action), it is considered that Policy SC/3 in the adopted Local Plan provides sufficient protection for this facility and therefore no specific policy for the village hall is included in the Neighbourhood Plan.

Policy PAM10 – Sustainable work-life patterns

21. Our Pre-Submission response stated that we felt that this policy replicated adopted South Cambridgeshire Local Plan policy. Cycle and electric parking are already covered by Policy TI/2 ‘Planning for Sustainable Travel’ from South Cambridgeshire’s Local Plan. Electric car parking is covered by policy

TI/3 'Parking Provision' and policy TI/10 'Broadband' already covers broadband. It is also likely to be covered in the new Local Plan. PAM10 should be demonstrably different, and local in nature, compared to the Local Plan policies.

22. Our Pre-Submission response questioned how the requirement to incorporate a dedicated home office area could be monitored and enforced? We still have concerns regarding this, in particular how this will be delivered alongside PAM1 requirements for smaller units and be viable.

Policy PAM11 - Trees and woodland

23. We suggest adding wording to add clarity to the policy as a tree survey to BS5837 will not identify ecological value, suggest wording 'will be expected to be accompanied by a professional arboricultural survey report undertaken to the appropriate standards (to BS5837) and a preliminary ecological survey identifying the arboricultural landscape and biodiversity value of the trees'. Additionally, we recommend that Biodiversity Net Gain wording, as statutory requirement it can be removed from the policy PAM11 wording.
24. We recommend adding wording to point 2 of the policy, regarding financial contribution, to clarify to what trees; sizes and values, would the contribution apply.
25. We recommend the compensatory provision wording in section 3 of PAM 11, that the industry accepted calculation method would now be covered by BNG rather than CAVAT.

Policy PAM12 – Protecting and enhancing biodiversity in Pampisford Parish

26. The policy has two sets of Roman numerals which will make it difficult for those using the Plan to refer to. Would recommend that one of the sets becomes a) b) etc
27. We recommend that Biodiversity Net Gain wording, as statutory requirement, can be removed from the policy PAM12 wording.

Policy PAM 13 – Development, movement and traffic

28. Policy TI/3: Parking Provision of the adopted Local Plan states that car parking provision should be provided through a design-led approach in accordance with the indicative standards set out in Figure 11 of the Plan. We suggest that the second paragraph of the PAM13 should refer to the Parking Standards in the extant adopted local plan.

The Highway Authority can only seek works that directly mitigate the impact of a development, so the use of ‘quiet tyre technology’ would fall outside our remit and would also require careful consideration in relationship to its life span and durability.” The visual impact of additional vehicle movements would also be difficult to measure and define. We suggest this is removed from PAM13 policy wording.

Policy PAM 14 – Preventing environmental pollution from Pampisford businesses

29. Our Pre-Submission response questioned why the policy is asking for an assessment of potential pollution when the South Cambridgeshire Local Plan already asks for assessments on development through policies SC/10-Noise pollution, 9.54 “noise impact assessment”, SC/12-Air Quality, 7. ‘relevant assessment’, SC/14- Odour and Other Fugitive Emissions to Air 2 and SC/HQ-1 n, and CC/1. PAM14 should be demonstrably different, and local in nature, compared to the Local Plan policies.

30. Our Pre-Submission response stated that there were not clear environmental receptors (areas which are places that could be harmed by pollution, i.e. parks, wildlife habitats) identified in the policy. We continue to suggest that Policy PAM14 should include clearly identified environmental receptors that must be considered.

Policy PAM 15 – Brewery Road employment

31. We recommend that that wording is added to PAM15 to reference PAM3, which is concerned with development abutting the Development Framework and a requirement to include a generous countryside buffer, which would appropriate and relevant to PAM15.

Policy PAM 16 – London Road employment area

32. Our Pre-Submission response queried whether either of the policy points in PAM16 were distinct from PAM4? We continue to suggest the two policies are not demonstrably distinct from each other, are both policies required?

Policy PAM 17 – Rectory Farm employment area

33. Our Pre-Submission response highlighted that the use of the word “harmony” is not generally used when it comes to considering the impact of development on heritage assets, and instead we highlighted paragraphs 199 to 208 of the NPPF which identifies that the impact on heritage assets should be measured

in terms of “harm”. We note that the wording in policy PAM17 has been amended, however, we recommend further adapting the policy wording of the second point to read: “Development preserving or enhancing heritage assets...”, to ensure robust policy wording.

34. Regarding Rectory Farm Meadows in the supporting text at paragraph 6.17.1. As these meadows appear to be within the conservation area, we recommend replacing the fourth sentence that starts with ‘Rectory Farm Meadows ...’ with a sentence such as: “*The special contribution which the open space at Rectory Farm meadows makes to the conservation area (see Map 5) should be conserved or strengthened.*” We further recommend the extent of Rectory Farm Meadows, and the Conservation Area, are illustrated on one map to provide clarity over how the different areas relate to each other.

Policy PAM 18 – Protecting and enhancing access to and enjoyment of the countryside

35. We suggest including supporting text that where planning consent is required that new country walking routes, and access to woodland, should include gateways and styles that are accessible for mobility scooter users, wheelchair users and walkers using sticks for guidance or balance. If any pathway surfaces are constructed these surfaces need be usable by these groups as well.
36. We recommend the second paragraph of policy PAM18 is moved from the policy into the supporting text as planning applications cannot create a public right of way.
37. We suggest replacement wording “Measures to improve and extend the existing network of public rights of way and bridleways will be supported particularly if their value as biodiversity corridors is recognised and safeguarded”.

Policy PAM 19 – Local heritage and non-designated heritage assets

38. We recommend that at paragraph three of PAM19 the policy wording should read “preserve or enhance” not “conserve and enhance”.
39. In the fourth part of policy PAM19, we recommend that the heritage statement provided should be “proportionate to the assets’ importance and sufficient to understand the potential impact of the proposal”, rather than proportionate to the scale of the development.

General comments on the Pampisford Neighbourhood Plan

40. Whilst it is not a requirement to monitor a neighbourhood plan, we recommend including a section on monitoring as it will ensure that the Parish Council are able to review how effective policies are in practice and know when it is necessary to undertake a review of the Neighbourhood Plan.

Maps

41. On page 7, paragraph 1.8 you have included wording *“It should be noted that there is not one parish-wide Policies Map provided as part of this version of the NP. Instead, where a planning policy in Chapter 6 has site-specific implications, a policy map showing this is placed after the policy.”* We suggest that the wording is amended to highlight that the policies maps are those referenced within the wording of the policies and suggest rewording paragraph 1.8 as *“It should be noted that there is not one parish-wide Policies Map provided as part of this version of the Neighbourhood Plan. Instead, where a planning policy has site-specific implications, a policies map showing the policy extent is included for that specific policy and referenced within the policy wording.”*
42. Map 10, page 57, is not referenced within any policy or supporting text, and therefore we suggest the map is not required. Or, that a reference is added within the supporting text or policy wording of policy PAM10.
43. Map 13, page 72, shows four employment areas, however policies PAM14 to PAM17 only relate to three employment areas. The fourth employment area identified on the map is referenced in the supporting text, and that same supporting text references a fifth employment area, but the map only includes one of these two additional employment areas. For clarity, we recommend that Map 13 should differentiate between the employment areas covered by Policies PAM14 to PAM17, and the additional employment areas shown for information only. We also recommend that both additional employment areas should be highlighted on the map, or that neither are shown on the map.
44. We suggest it would be helpful to have all heritage assets on one map and in the format of Map 16 which is easier to read. Clarity would be required on the map that it is only the NDHAs that go with the policy (PAM19), and the Listed Buildings and Conservation Area are shown for illustrative purposes only.

Plan period

45. 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 that 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.

Grammar and typographic matters

46. We note that the references to the NPPF will need to be updated once a new NPPF has been published later in 2024, and these minor amendments can be made alongside any changes being made following examination of the Neighbourhood Plan.

Chapters 1 to 5

47. Our Pre-Submission response recommended that in chapter 3 evidence supporting the neighbourhood plan could also refer to South Cambridgeshire District Design Guide (2010) as this is an adopted SPD. In the District Design Guide, Pampisford is part of the 'Chalklands' character where a series of design principles are stated. Recently 'made' neighbourhood plans in Waterbeach and Gamlingay refer to the District Design Guide. It also highlighted the National Design Guide (2021). We continue to recommend the inclusion of this evidence and further to include a reference to the National Design Guide (2019) by the [Ministry of Housing, Communities and Local Government](#).

Chapter 6

48. 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'.

Appendices/Supporting Evidence documents

Appendix One: The Design Guidance and Codes for Pampisford

49. We note that Appendix One is now an updated version of the Design Code due to agreed changes made through consultation responses. We suggest that wording is added throughout the Neighbourhood Plan to make clear that the Appendix One version of the Design Code is the version to use when making decisions on planning applications, and that it takes precedence over the 2021 version.

Appendix Three: Locally important views and their key features

50. For the sake of completeness, it would be helpful to the user if reference was made to Map 6 at the start of the appendix in order that it can be seen where the viewpoint is.