

South Cambridgeshire District Council response to Stapleford and Great Shelford Neighbourhood Plan Regulation 16 Submission consultation

1. South Cambridgeshire District Council (SCDC) is taking the opportunity to comment on the Submission version (Regulation 16) of the Stapleford and Great Shelford Neighbourhood Plan. The District Council previously commented on the Pre-Submission (Regulation 14) draft of the plan that was consulted on in March 2024.
2. SCDC has worked with Stapleford and Great Shelford Neighbourhood Plan Steering Group 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 Stapleford and Great Shelford 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, 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 Stapleford and Great Shelford Neighbourhood Plan Steering Group to discuss the plan as it has evolved and to support the Steering 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 Stapleford and Great Shelford Neighbourhood Plan meets the Basic Conditions.

Updated National Planning Policy Framework (NPPF)

6. Since the submission of this plan on 22 November 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.

S&GS 1: Housing mix

7. We note that the policy is informed by the Housing Needs Assessment (HNA) 2023. Given that Table 5 of the Plan, which is taken from the HNA 2023, sets a recommended mix to meet need, we suggest that the policy would have greater clarity and provide certainty in how to 'prioritise the delivery of smaller homes (3 bedrooms or less) over larger homes' if part 1) a) referred to percentages for 1-, 2- and 4-bedroom dwellings as well the stated percentage for 3 bedroom dwellings. As currently drafted, it is not evident how the decision maker would determine if the delivery of smaller homes has been prioritised or how an applicant would demonstrate that they have prioritised the delivery of smaller homes.
8. Part 1) of the policy also states 'Development proposals that create one or more new dwellings ...'. This effectively relates to all proposals for new homes and, as such, reference to one or more new dwellings is superfluous. Part 1) of the policy proceeds to state 'the following provides a starting point for the determination of an appropriate housing mix'. Notwithstanding part 2) of the policy, and given the evidence in the HNA 2023, the wording of this section would benefit from being strengthened so as not to be overly permissive of alternative housing mixes.
9. Our pre-submission comments raised concerns about part 3) of the policy which requires all new housing to be built to the M4(2) standard. Following discussions with the Neighbourhood Plan Steering Group prior to submission, we let them know that we withdrew our concerns as our evidence to support the new Greater Cambridge Local Plan suggests that development would remain viable if all homes are required to meet the M4(2) accessible and adaptable standard. The costs of meeting this standard are less than £1,000 per dwelling.

S&GS 2: Prioritising local needs in the allocation of affordable housing

10. We note that this policy has been amended as a result of our pre-submission comments and the subsequent discussions we had with the Neighbourhood Plan Steering Group. We consider the policy principle reasonable as:
 - The Neighbourhood Plan highlights that there is a high level of affordable housing need in the plan area, including from those with a local connection to the area. The response to meeting the needs of those with a local connection is usually to deliver rural exception sites for affordable housing, and the Neighbourhood Plan supports this, but any rural exception sites are unlikely to deliver the number of homes necessary to meet needs.
 - The two villages of Stapleford and Great Shelford are wholly surrounded by Green Belt, and therefore it is not possible for the Neighbourhood Plan to allocate sites for housing to meet local needs on land outside the

development framework as this land is all within the Green Belt, and Neighbourhood Plans cannot allocate sites within the Green Belt or remove land from the Green Belt in order to allocate sites. It is therefore considered acceptable for Neighbourhood Plans in this situation to specify that local connection criteria can be applied to a proportion of the new affordable homes on future Local Plan allocations and any windfall sites (that are not rural exception sites, and where affordable housing can be secured) outside of the development framework boundary.

11. The Neighbourhood Plan seeks through this policy to secure additional affordable housing for those with a local connection by requiring a proportion of any affordable housing on schemes outside of the development framework in the adopted South Cambridgeshire Local Plan 2018 to be for those with a local connection. When affordable housing is provided, in accordance with Policy H/10, on windfall sites (generally within the development framework) it is important that these affordable homes are used to meet district wide needs and are prioritised for those in greatest housing need. We therefore do not support affordable homes secured on schemes within the development framework being limited to those with a local connection. In this policy, limiting the application of the local connection criteria to up to half of the affordable homes allows the other half of the affordable homes to be used to meet district wide needs and to be prioritised for those in the greatest housing need.
12. However, we consider the wording of the policy could be clarified to ensure that it can be consistently applied in decision making and to achieve the outcome being sought. It is suggested that part 1) should state 'For any residential schemes outside of the development framework boundaries of Stapleford or Great Shelford (as defined in the adopted South Cambridgeshire Local Plan 2018), where affordable housing is secured 50% of the affordable homes should be offered in the first instance to those with a strong local connection to either of the two parishes, as defined in the supporting text to this policy.'
13. The bullet point list within part 1) of the policy does not appear to be necessary as the wording of the final bullet point 'other residential development that secures consent', in effect makes this part of the policy applicable to all residential development that includes affordable housing, and which is located outside of the current village development frameworks. This list could therefore be omitted with revised policy wording.

S&GS 3: Rural exception housing

14. The policy overlaps with the requirements of Local Plan Policy H/11, especially clause 1. Our pre-submission comments raised concerns that this policy provided

support for small-scale rural exception sites but lacked clarity regarding support for larger-scale rural exception sites. We acknowledge that paragraph 6.42 has been introduced to the plan to provide additional detail in relation to scale. However, including the final sentence that states 'schemes would not be expected to exceed 25 units' is not supported as specifying a maximum indicative size is not in conformity with part 1b of Policy H/11 which only requires that the development is of a scale appropriate to the size, facilities and character of the settlement.

15. We also note that the policy 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.
16. Our pre-submission comments also suggested that part 1) e) (previously part d within the pre-submission plan), was clarified. The expectation of this requirement was not considered to be clear. If the expectation of this requirement is to require all rural exception sites to provide a report detailing how 'every available opportunity to provide or link up with existing sustainable routes', we would not consider this requirement to be reasonable. Some minor changes have been made to the policy requirement, but the general requirement remains the same. Therefore, we continue to make the same suggestion as before.

S&GS 4: Meeting the needs of the older population

17. Part 1) f) of the policy requires contributions for healthcare provision if deemed necessary to mitigate additional demand. As all development of this nature would likely create additional demand, we'd query if there is a size of development that this is aimed at? This policy requirement could impact the viability of smaller schemes. Such contributions are typically delivered through planning obligations attached to a planning consent rather than through the proposal itself. It may be better if f) were a separate element of the policy to state that contributions towards additional capacity in health services will be sought, where necessary, through planning obligations.

S&GS 5: Residential annexes to facilitate multi-generational living

18. Our pre-submission comments recommended re-wording 'supplemental dwelling' to 'annexe'. This has mostly been done but part 1) of the policy still refers to 'the supplemental dwelling', which is not a recognised term in land use planning.
19. Part 1) b) of the policy refers to the 'functional relationship' between an annexe and a dwellinghouse. The policy provides examples of what a functional relationship is. These examples should be removed so that the functional

relationship can be determined on a case-by-case basis. Just because an annexe and dwelling share a garden, it does not automatically mean that there is a functional link between the main house and the annexe.

20. The policy also refers to 'over-development' in the paragraph 6.61, part 1) e) and part 3), but gives no indication about what would be considered as over-development.

S&GS 6: Development and design

21. Our pre-submission comments raised concerns that the draft policy, as worded, was lengthy and hard to follow. It was recommended that the policy did not repeat the design code. While amendments have been made to this policy for the submission version, we consider that our previous comments have not been addressed and we continue to make the same recommendation to not repeat the design code within the policy. Any additional detail that is important to a policy that is not appropriate to include in the policy or supporting text, should be set out in an appendix.
22. Part 1) a) to part 1) i) relies heavily on references from the supporting 'Stapleford and Great Shelford Design Guidance and Codes' document and in some cases the Stapleford and Great Shelford Conservation Area Character Appraisals. All these references make the policy long, unwieldy and indirect (leaning too heavily on the supporting documents). The opening element of the policy already states that development should be guided by those documents and, as such, the references are not required.

S&GS 7: Mitigating and adapting to climate change through building design

23. Additional references have been added and amendments made to the supporting text in light of our pre-submission comments, which are welcomed. However, whilst the overall thrust of the policy is welcomed, concerns were raised within our pre-submission comments about the policy requirement for all development to provide a sustainability statement being overly onerous, notably for householder extensions. This has been revised within the submission plan, but the policy still applies to development 'involving new buildings, dwellings and residential extensions'. We consider the inclusion of residential extensions to be overly onerous and many aspects involved in retrofitting existing homes will sit outside of the remit of the planning system, limiting the effectiveness and implementation of the policy. As such, our original comments remain outstanding.
24. Within part 2 c) of the policy, the plan states 'Due to the Plan area lying in an area of water stress and relying on underground aquifers'. This passage of text would be better placed within the background context and rationale.

S&GS 8: Renewable energy schemes in Stapleford and Great Shelford

25. Our pre-submission comments queried whether this Policy expanded upon SCDC Local Plan Policy CC/2. As the policy is largely unchanged, we continue to query whether this policy expands on Policy CC/2 as to avoid unnecessary duplication of the planning policies that apply to a particular area.
26. The Policy also requires Policy S&GS 12 to be read in conjunction. Our pre-submission comments highlighted that this would create difficulty when using the neighbourhood plan.

S&GS 11: Trees and development

27. Part 2) of the policy states 'Replacement trees should be mature saplings (3-15 years)' and our pre-submission comments suggested that this reference to trees size was removed. 'Mature saplings' is not a description used in horticulture/tree/landscape industries and has no meaning. It would be better to use the phrase 'advanced nursery stock' which covers a range of larger tree sizes and is a recognised term. Alternatively, the policy text could be revised to say 'replacement trees should be planted at a suitable size to compensate for the removed trees'.
28. Part 2) of the policy further states 'All trees and hedgerows of good arboriculture value should be retained as an integral part of the design of any development'. It would be useful to link this to BS5837 tree categorisation, such as Category A and B trees to be retained subject to their structural and physiological condition.

S&GS 12: Protecting Stapleford and Great Shelford's landscape character

29. Our pre-submission comments noted that part 1) c) of the policy could be open to interpretation and it was therefore suggested that the wording be changed from 'be sympathetic to the characteristics' to read 'be in accordance with the characteristics'. This part of the policy remains unchanged, and we continue to suggest that the wording is changed

S&GS 13: Important views

30. Views (Aa and Bb) which are already part of the adopted Cambridge Local Plan 2018 (Appendix F) do not need to be unnecessarily duplicated in the plan. 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 of Cambridge from the Neighbourhood Area

cannot be considered when making decisions on planning applications within Cambridge City Council's area.

31. Furthermore, the policy includes a list of 29 views that will be onerous for the decision maker to assess when determining planning applications. Given the quantity of important views identified and the panoramic nature of several of the views, we would query whether all views identified are important enough to warrant designation. Appendix 7 describes the 'key contributing features to sense of place' of each important view, rather than the specific key or significant features that are the focus of the view. The key contributing features identified for many views include locally ubiquitous features such as a strong sense of countryside and tranquillity, and the adopted Local Plan Policy NH/2 already seeks to ensure that local landscape character is respected, retained and enhanced. Only a small number of views identify specific key or significant features, such as within Views J or K where it states 'Clear view of White Hill settled hilltop estate, a characteristic feature of local chalkland hills landscape'. The relatively low threshold for designation has resulted in effectively all land to the North, West and East of the Villages' built-up area 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.
32. Additionally, View S is along one of the proposed access points towards the proposed allocation (S/RSC/HW Land between Hinton Way and Mingle Lane, Great Shelford) in the Greater Cambridge Local Plan First Proposals Regulation 18 consultation.

S&GS 14: Important Countryside Frontages

33. There is a typo in paragraph 8.22, the relevant adopted Local Plan policy is NH/13 not NP/13.
34. We have concerns about the justification for all three of the proposed Important Countryside Frontages (ICFs), given that this policy is effectively the same as Policy NH/13 of the adopted Local Plan although written slightly differently. The definition of an ICF within Policy NH/13 requires land with a strong countryside character either: to penetrate or sweep into the built-up area providing a significant connection between the street scene and the surrounding rural area, or to be an important rural break between two nearby but detached parts of a development framework.
35. Although proposed ICF A 'Stapleford - Frontage between 41 Gog Magog Way and properties at Chalk Hill' appears to be a gap between dwellings, the dwellings at the north-eastern end of this proposed ICF at Chalk Hill are not

defined as being within the built-up area of Stapleford as they are not within the development framework boundary. Therefore, whilst the land to the north-west of this proposed ICF is an area of countryside character, it does not meet the requirements to be considered for an ICF as the countryside does not penetrate or sweep into the defined built up area of Stapleford to provide a significant connection between the street scene and surrounding rural area nor is it between two nearby but detached parts of the development framework.

36. Whilst proposed ICF B 'Stapleford – Frontage between 27 and 31 Mingle Lane' is an area that allows for countryside character to penetrate the built-up area, the frontage is only approximately 20m long, which is significantly shorter than a typical ICF from the adopted Local Plan. This proposed ICF is also within the development framework boundary. The countryside view from the proposed ICF can only be observed from a small part of Mingle Lane directly adjacent to the frontage and makes little impact to the wider Mingle Lane street scene, which already has glimpses to the countryside through gaps between neighbouring dwellings. This gap only allows for a brief connection between the street scene and countryside character which cannot be described as significant. Additionally, this gap in the built development along Mingle Lane is proposed as one of the access points to the proposed allocation (S/RSC/HW Land between Hinton Way and Mingle Lane, Great Shelford) in the Greater Cambridge Local Plan First Proposals Regulation 18 consultation.
37. Although proposed ICF C 'Stapleford – frontage east of Haverhill Road' is adjacent to dwellings on Haverhill Road, these dwellings along with the neighbouring dwellings on Gog Magog Way and at Chalk Hill are not defined as being within the built-up area of Stapleford as they are not within the development framework boundary. Therefore, whilst the land to the east of Haverhill Road is an area of countryside character, it does not meet the requirements to be considered for an ICF as the countryside does not penetrate or sweep into the defined built up area of Stapleford to provide a significant connection between the street scene and surrounding rural area nor is it between two nearby but detached parts of the development framework.
38. Based on the above, we do not consider that any of the three proposed ICFs (A, B or C) meet the criteria for designation, and therefore all three should be deleted from the Neighbourhood Plan.

S&GS 16: Preserving our dark landscape

39. The Consultation Statement clarifies that this policy applies to all developments. We have concerns that the application of this policy to all developments could be overly onerous for small scale development to comply with. Our pre-submission comments recommended that policy wording be reconsidered, as it will be

difficult to enforce this policy for all development within the village, particularly to restrict lighting being emitted from extensions/small scale developments. It must be noted that many domestic lighting schemes do not require planning consent.

S&GS 17: Delivering community infrastructure priorities alongside new development

40. It is considered that the application of Part 1 of the policy to 'all development proposals' is excessive. The policy should be reworded as not all development would need to provide infrastructure priorities and to appropriately reflect Policy TI/8 of the SCDC Local Plan.

S&GS 18: Facilitating active travel in Stapleford and Great Shelford

41. Our pre-submission comments recommended that the wording of part 1) of this policy was amended to specify the level or scale of development as the pre-submission plan referred to 'All Development' which would be onerous if the proposal were minor e.g., a single storey rear extension. The submission version of the plan has inserted '(as appropriate and proportionate to the nature and scale of the proposed development)' to the policy, but the policy still leads with the term 'all development'. The revised wording is ambiguous. It is not clear which types of development are expected to incorporate walking and cycling routes. Therefore, our pre-submission comments to specify the scale of development are reiterated to prevent this unintentionally becoming an onerous requirement on small scale development.
42. It was also recommended that part 2) of the policy should be amended to reflect the scale of the development that would trigger the requirement. As drafted in the pre-submission plan, all proposals would generate some level of movement, for example, a single storey rear extension would generate contractor movements, although temporary, under this policy, the proposal would need to either improve the connectivity across the wider neighbourhood or contribute to highlighted travel links under Map 13. No amendments have been made to this part of the policy, and we therefore reiterate the need for the policy to reflect the scale of the development.
43. It was also recommended that part 3) of the policy should include clarification of the scale of 'development proposals'. Our pre-submission comments suggested that part 3) should also refer to other or all active travel modes, rather than just pedestrian connectivity. We acknowledge the response to this pre-submission comment, highlighting that pedestrian connectivity is key, but we still believe that there is scope to refer to other active travel modes.

S&GS 19: Managing the impacts of new development in the Plan area with respect to the movement of people and vehicles

44. Our pre-submission comments recommended that consideration was given to the overall content of the policy. Most of the points raised are already mitigated through the inclusion of conditions securing Traffic Management Plans and Construction Traffic Route Plans, as well as Construction Environmental Management Plans. Transport Assessments are required for all major developments. As no significant changes have been made to this policy, we reiterate that consideration should be given to the content of the policy.
45. The wording of part 3) of the policy (previously part 2) should be reconsidered as most minor developments do not cause adverse impacts and any impacts would be over a brief period of time. Clarity is needed about the scale of development which is required to provide the information stipulated within part 3) of the policy. Our pre-submission comments noted that the expectation within this part of the policy for developers to widen streets/pavements and provision of crossing points will need approval of the Local Highway Authority through separate permissions.

S&GS 21: Stapleford and Great Shelford's Improved Landscape Area

46. Our pre-submission comments queried how the improvements listed within paragraph 11.32 (previously paragraph 11.29) will be managed if the land is outside of the red line plan/ownership of the applicant. We note that the response to this comment acknowledges that opportunities may not be available. If the deliverability of the identified improvements is not known, we would now query whether parts of the supporting text and policy need to be clearly labelled as aspirations instead. Another alternative is to rename it as a 'strategy' which includes the identified improvements listed in paragraph 11.32 and could be delivered through S106 contributions, by community or charity groups or by developers.
47. It would also be helpful if the identified improvements listed within paragraph 11.32 were labelled or numbered on Map 14.
48. It is also unclear whether the onus is on the applicant, LPA or the Parish to seek the opportunities listed within paragraph 11.32.

Appendix 2: Design Guidance and Codes checklist

49. The 6-page long checklist (on pages 149-154 in appendix 2) has been taken from the 'Stapleford and Great Shelford Design Guidance and Codes' supporting document and policy S&GS 6 encourages applicants to submit a completed

checklist. The checklist is comprehensive and practical, if long. Nevertheless, we consider that some of the 80 questions would not be relevant for small-scale proposals for development in the Neighbourhood Plan area. Including a statement at the start of the appendix to state that “proposals should demonstrate how they meet the checklist, as relevant to the development” would help provide clarity. It should also be remembered that the local planning authority would use the appendix when determining applications. Currently it only refers to the Parish Council.

Appendix 7: Important views

50. It would be helpful if Appendix 7 contained a copy of Map 7 for ease of reference when reviewing the Appendix.