

F.A.O. Andrew Ashcroft
NP Examiner
Cottenham Neighbourhood Plan
c/o South Cambridgeshire District Council

6th June 2019

Re: Clarification questions

Dear Andrew,

Thank you for agreeing to examine our draft plan and for the questions on which you require some clarifications.

Our NP Working Group has considered your questions and the attached responses have been approved by Cottenham Parish Council.

We also have a draft set of partial responses to the Regulation 16 representations and will be passing these on within a few weeks once we have prepared some more detailed comments on three issues in particular:

- The objective assessment of housing need and how the plan meets it
- The delineation of the revised development framework
- The spatial layout of housing, leisure and sports provision at Lambs Lane / Rampton Road

We are aiming to review these at our Planning Committee on 20th June and pass them over soon afterwards. We trust this does not upset your planning too much.

Yours sincerely,



Frank Morris
Chair,
Cottenham Parish Council

ANNEX: Clarification Questions for the Parish Council (CPC responses are in red text)

Policy 1-2

On what basis does the Parish Council expect developers to go beyond national standards?

Our logic is based on the importance of heritage assets to the character of Cottenham, not least the 66 listed buildings (one at Grade I, others at Grade II), the extensive Conservation Area and a number of recently-identified non-designated heritage assets. This importance was recognised in the Cottenham Village Design Statement and, more recently, by the AECOM Heritage & Character Assessment undertaken as part of the research for this Neighbourhood Plan (both of which now form part of the evidence base for the draft plan. The protective language of the policy is based on Chapter 4 of the SCDC Supplementary Planning Document related to development in Conservation Areas, although this has diminished planning weight as National PPG15 has been withdrawn and current protection under NPPF appears only to protect buildings listed Grade II or higher.*

Policy 1-5

In part b) why has the figure 3 been selected?

Cottenham's character is based on a diversity of building styles as outlined in the Village Design Statement which emphasises the importance of new buildings reflecting their "Cottenham context" (VDS policy B/6) and the inability of mobile homes to reflect that context (VDS policy B/8). Terraces or continuous groups of near-identical homes are unusual in Cottenham even in the newer developments. That said, there are a few terraces of up to 4 or 5 near-identical homes that have blended in well so 5 would be a more practicable number.

In part f) what harm would be caused with parking provision at the front?

VDS (policy B/6) includes a clause not to obscure house fronts by parking areas and many houses in Cottenham are built close, or directly adjacent, to the footway. Adequate parking at the house sides would help avoid the congestion problems of roads like Rooks Street where inconsiderate and extensive on-street parking often restricts access for blue light emergency service vehicles.

Policy 1-7

Is any part of Les Wood affected by the Cambridgeshire County Council development?

Yes, although the final demarcation line is not yet set. Allowing part of the wood to be "nibbled" into by the development combined with measures to manage the wood better would create a better margin between the development and the recently-created bridleway alongside the Catchwater Drain. Discussions with This-Land, which now owns the development, although paused for several months, should set the boundary within a matter of weeks as they prepare their Reserved Matters planning application.

Policy 2-1

The policy comments that the development framework should be extended. Does the Plan itself propose to do so or is the policy an expectation that the District Council would do so at some point?

The Plan accepts the SCDC strategy of development frameworks but proposes to align the tactical framework with the boundary of established development permissions extant when the examination is completed. The principle that a NP can lead on this has been set in made plans in which the LP caught up in its own subsequent revisions. In the Cottenham case, the framework boundary has been extended to include developments actually built out or with outline permission as a minimum. One aspect affecting this new line is the possibility that one or other of Gladman Developments or This-Land have their permissions lapse by failing to submit Reserved Matters applications within the relevant deadlines.

Policy 2-2

Given the approvals which now exist in the neighbourhood area for new residential development what purpose will this policy serve?

The value of the policy is already evident in discussions with developers seeking Reserved Matters permissions and, in some cases, during liaison meetings with developers such as Bellway or Persimmon. This policy incorporates and adds weight to certain essential design features drawn from Cottenham's Village Design Statement which is not part of the recently-adopted Local Plan.

Is the approach anticipated in paragraph 2-2e practicable?

Yes, the policy has evolved out of discussions in the Cottenham Flood Risk Forum, a multi-agency working group initiated by CPC with the help of our MP, Heidi Allen, and bringing together the Environment Agency, Internal Drainage Board, Anglian Water, the County, District and Parish Councils to ensure that the risks presented by the extensive new developments in and to the south-east of Cottenham are properly addressed in flood-sensitive areas like Cottenham.

The relevant surface water planning conditions applied to the Persimmon Reserved Matters permission are now substantively aligned to this policy which will also be pursued on the remaining two large applications which have yet to apply for RM permission.

The various partner bodies are applying the same principle in major developments such as in Waterbeach.

Policy 3-1.1/3.1.2

I can see the relationship between Policies 3-1 and 3-1.1/2

However, the reference to the medical centre/drop-in centre in both sites is confusing. As submitted neither policy has the necessary clarity.

In particular:

- in the event that a medical centre is developed on either of the two sites could development simply proceed on the other site making the provision for sections B and C of each policy?
- in the event that a medical centre was delivered on another site in the village centre could development simply proceed on both the identified sites making the provision for sections B and C of each policy?
- In the event that it became clear that the provision of a medical centre was not viable could development simply proceed on both of the identified sites making the provision for sections B and C of each policy?

Subject to the responses to the points above I am minded to recommend that both policies 3-1/1 and 2 are modified so that they would support the range of uses identified in each case rather than the complicated association with the wider development of a medical centre. Does the Parish Council have any specific comments on this proposition?

We broadly agree and will propose a simpler form of words to the policy.

Policy 3-2

I can see that associated residential accommodation would be desirable. However, is it essential if the over-riding ambition is to facilitate a new supermarket?

In any event is it practicable to include apartments within a supermarket (on upper floors) when most such buildings have vaulted roof structures rather than traditional upper floors? Might such design requirements otherwise prevent a supermarket from coming forward?

I am minded to recommend a modification which deletes the residential element. Does the Parish Council have any comments on this proposition?

The proposed "supermarket" is not likely to be of a scale that would preclude accommodation above and the financial gain may improve the viability of such a scheme. For example, the existing Co-op supermarket in Cottenham does not have a vaulted roof.

Policy 3-2.1

I can see the relationship between Policies 3-2 and 3-2.1

However, on what basis has the Watson's Yard site been specifically identified as a site for a supermarket beyond and any other site in the village core?

Watson's Yard appears to be the only central site of sufficient scale that would make a new supermarket possible.

On what basis have the numbers in parts C and D of the policy been determined? Are they too prescriptive?

The language can be made less prescriptive with a clearer statement of priorities.

- a) Ensure the future of the Fire Station
- b) If possible, add a supermarket
- c) If possible, add residential

Can the site actually accommodate the four types of development proposed?

All four types were not envisaged to co-exist, but the "interlock" language obscures this; we will propose a re-wording.

Policy 4-2

Is the policy now necessary following the recent grant of planning permission for the use intended (S/2702/18/FL)?

We believe so, the planning permission, in the event of a failure to start within three years, would lapse and may be difficult to renew given the Local Green Space and other restrictions (although the framework move helps, of course).

Policy 4-3

Is the policy now necessary following the recent grant of planning permission for the use intended (S/2705/18/FL)?

We believe so, the planning permission, in the event of a failure to start within three years, would lapse and may be difficult to renew given the Local Green Space and other restrictions (although the framework move helps, of course).

Policies 4-4 and 5-1

Please can the Parish Council clarify the relationship between the two policies?

The policies can be simplified and 4-4c deleted now that the County Council intentions are clearer.

4.4 can meet the medium-term needs of Cottenham if the additional land is prepared for more intensive use with all-weather flood lit provision.

5.1 is the "back-up" plan should floodlit operation be precluded.

As I understand the situation Policy 4-4 proposes a defined parcel of land and Policy 5-1 is not site-specific. Is this correct?

Yes

Would the development of a second recreation ground be practicable and/or viable?

There are suitable areas of Green Belt land available to the southeast of Cottenham and provision of a Play Area in that quarter would help balance geographic provision within Cottenham. The land purchase could be funded from Open Space s106 contributions from the permitted developments.

What would be the intended trigger point for the identification/delivery of a second recreation ground? As submitted the policy that it would occur if that Policy 4-4 is not fully achievable

within 5 years. Does this mean that no progress has been made within that period?
In any event would the issue of a second recreation ground be a matter for the review of any made neighbourhood plan?

Rather than 5-years, the trigger point should be inability to obtain planning permission for floodlighting within a more intensively-used upgrade with policy 4-4 or significant loss of sports space as a result of an extension to the Primary School.

Policy 6-1

Is the policy supporting a general extension of burial grounds? Or a specific proposal as set out in the Evidence Paper E10? Or both?

More a general extension with the Evidence Paper indicating how that might be achieved.

Policy 7-2

The principle of rural employment is acceptable. However as submitted the policy has no spatial dimension. Was this intentional?

No, it should have made “outside the framework” explicit.

Policy 7-3

At face value this policy is contrary to the Green Belt policies in the NPPF. Similarly, it appears to be determining a current or a future planning application rather than setting out a policy. Please could the Parish Council expand on its approach to this matter? Paragraph 7-3f appears to do so. However, it is not immediately obvious how an expansion on an existing brownfield site in the Green Belt would enhance the Green Belt. Plainly it would affect its openness.

More a neutral, rather than enhancing, effect on the Green Belt itself – with a much bigger social and traffic benefit to the village centre.

Maps

Some of the maps in the Plan are confusing or at odds with one another. Please could I be provided with a comprehensive and large-scale map that showed the inter-relationships between the parcels of land affected by policies 4-2, 4-3 and 4.4 in and around the Recreation Ground.

Please advise your interpretation of “large-scale”; we may be able to resolve the comprehensiveness and precision aspects of this request within our existing resources.