

Cottenham Neighbourhood Plan - submission consultation

O - 67657 - 23632 - Chapter 4 Conserving the village character - None

67657 Object

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: Gladman Developments (Mr John Fleming) [23632] Agent: N/A

Full Text:

Summary: Policy COH/1-2 Heritage Assets

Do not consider second element of policy which seeks to require development proposals to go 'over and above' protection in NPPF and Local Plan is appropriate. Approach is not in accordance with requirements of NPPF. Policy should be modified so development proposals are considered in accordance with requirements of national/ local policy and guidance. As such this policy is not in accordance with basic condition (a) - having regard to national policies and advice.

Attachments: Under rep 67656
Representation
Response form

Cottenham Neighbourhood Plan - submission consultation

O - 67659 - 23632 - Chapter 4 Conserving the village character - None

67659 Object

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: Gladman Developments (Mr John Fleming) [23632] Agent: N/A

Full Text:

Summary: Policy COH/1-6 Village Character - village core or centre.

Concerns about policy requirement to include electric charging points - not supported by robust evidence. Need to engage with energy suppliers to determine network capacity before proposing policy. Charging demand if excessive could overload capacity of existing infrastructure - lead to need for new sub-station. Cost of new infrastructure may impact adversely on delivery of development proposals and thus impact delivery of sustainable development. Need for flexibility in Plan to ensure policy is not too prescriptive making development unviable.

Recommend that reference to electric charging facilities be deleted. Conflicts with basic conditions

Attachments: Under rep 67656
Representation
Response form

Cottenham Neighbourhood Plan - submission consultation

O - 67665 - 28714 - Chapter 4 Conserving the village character - None

67665 Object

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: This Land [28714]

Agent: Bidwells (Anthony Child) [28713]

Full Text:

Summary: Policy COH/1.7 Local Green Space

This Land have controlling interest in land to NE of Rampton Rd which has outline planning permission for 154 dwellings. Currently in discussion with Parish Council over best use of site.

Supports principle of policy however discussions with the Parish Council and community are on-going - no final detailed layout for whole site fixed - current policy wording does not allow for sufficient flexibility to allow for improved layout. Need for flexibility through planning application process to modify boundary of these designations to facilitate delivery of housing alongside securing improved configuration of sports facilities etc.

Suggest change to wording of policy.

Attachments:

Response

PART B – Your Response

For office use only

Agent number:

Representor number:

Representation number:

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

Policy or Paragraph Number (Please state)

COH/1.7
COH/2.1
COH/4.1
COH/4.4

Do you Support, Object or have Comments?
(Please tick)

- SUPPORT**
- OBJECT**
- 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.

These representations have been prepared by Bidwells on behalf of This Land in response to the Cottenham Neighbourhood Plan Submission Public Consultation. This Land welcomes the opportunity to engage positively in the Neighbourhood Plan process and supports the overarching objectives of the Cottenham Neighbourhood Plan, however, wishes to make constructive comments in relation to policies COH/1.7, COH/2.1, COH/4.1 and COH/4.4 to ensure that the delivery of identified development sites within the village is not unduly constrained.

This Land have a controlling interest in land to north east of Rampton Road, Cottenham ("the site") which benefits from outline planning permission, granted at appeal, for 154 residential dwellings (application ref: S/2876/16/OL, appeal ref: APP/W0530/W/17/3187048). The site is identified as a development site in the Cottenham Neighbourhood Plan in Figure 14 (ref: CCC) and as an extension to the village's Development Framework in Figure 15 (ref: D). This Land is intending to bring forward a planning application in order to deliver homes on the site and has been in constructive discussions with the Parish Council to develop proposals which make best use of the site, alongside securing an improvement to the overall configuration of sports space and community facilities.

Policy COH/1.7

This Land supports the principle of Policy COH/1.7 in designating Local Green Spaces (LGS) for the village and allowing for the improvement of the overall configuration of sports space. Figure 12 proposes various land use designations within this area of the village, designating land to be used for Sport/Local Green Space, Housing and Local Green Space.

Whilst This Land supports the principle of the policy, it is considered that given that discussions with the Parish Council and community are still on-going and that the final detailed layout and design of the development proposals for the whole site are yet to be fixed, the current policy wording does not allow for sufficient flexibility to allow for an improved layout. Flexibility is required should it be found to be preferable, through the detailed design and planning application process, to modify the boundary of these designations to facilitate the delivery of housing alongside securing an improvement to the overall configuration of sports space and community facilities.

Therefore, it is considered that the following wording be included within the policy: "This policy allows for the Local Green Space alterations identified in Figure 12 to be reconfigured further if necessary, to facilitate the delivery of housing and improve the overall configuration of sports space".

Policy COH/2.1

This Land supports the principle of Policy COH/2.1 and recognise the need to identify a boundary for which development necessary to meet Cottenham's housing need should be permitted within. Figure 15 identifies an extension to the Development Framework on land to the north east of Rampton Road, identified as site D.

Whilst This Land is supportive of extending the development framework in this location and setting a boundary to ensure that applications outside these boundaries would be subject to countryside policies unless specific policies apply, it is considered that given that discussions with the Parish Council and community are still on-going and that the final detailed layout and design of the development proposals for the whole site are yet to be fixed, the current policy wording does not allow for sufficient flexibility to allow for an improved layout. Flexibility is required should it be found to be preferable, through the detailed design and planning application process, to modify the development framework boundary to facilitate the delivery of housing alongside securing an improvement to the overall configuration of sports space and community facilities.

Therefore, it is considered that the following wording be included within the policy: "To support the delivery of housing and improve the overall configuration of sports space, the development framework in relation to site D (as shown in Figure 15) is currently considered to be indicative and, if necessary, will be updated following the grant of any planning consent to ensure that the development framework replicates the permitted site boundary. Any planning application that comes forward in relation to site D which proposes built development beyond the indicative development framework will not be subject to countryside policies."

Policy COH/4.1

This Land supports the principle of Policy COH/4.1 in supporting the development of community, recreation and sports facilities at the recreation ground. Figure 26 identifies the preferred expansion of the recreation ground.

Whilst This Land supports the principle of enhancing the recreation ground and facilities and wish to help facilitate such improvements if possible, it is considered that given that discussions with the Parish Council and community are still on-going and that the final detailed layout and design of the development proposals for the whole site are yet to be fixed, the current policy wording does not allow for sufficient flexibility to allow for an improved layout. Flexibility is required should it be found to be preferable, through the detailed design and planning application process, to reconfigure the recreation ground expansion to facilitate the delivery of housing alongside securing an improvement to the overall configuration of sports space and community facilities.

Therefore, it is considered that the following wording should be deleted from the policy "(as shown in Figure 26)" and that the following wording is included within the policy "Figure 26 shows the preferred location of the expansion of the recreation ground. The exact location of the possible expansion is yet to be determined. As such, this policy allows for the preferred possible expansion of the recreation ground to be reconfigured if necessary, to facilitate the delivery of housing and improve the overall configuration of sports space".

Policy COH/4.4

This Land supports the principle of Policy COH/4.4 in providing further sports facilities for the village. Figure 26 identifies the preferred expansion of the recreation ground.

Whilst This Land supports the principle of enhancing the provision of sports facilities and wish to help facilitate such improvements if possible, it is considered that given that discussions with the Parish Council and community are still on-going and that the final detailed layout and design of the development proposals for the whole site are yet to be fixed, the current policy wording does not allow for sufficient flexibility to allow for an improved layout. Flexibility is required should it be found to be preferable, through the detailed design and planning application process, to reconfigure the recreation ground expansion to facilitate the delivery of housing alongside securing an improvement to the overall configuration of sports space and community facilities.

Therefore, it is considered that the following wording should be deleted from the policy "(as shown in Figure 26)" and that the following wording is included within the policy "Figure 26 shows the preferred location of the expansion of the recreation ground. The exact location of the possible expansion is yet to be determined. As such, this policy allows for the preferred possible expansion of the recreation ground to be reconfigured if necessary, to facilitate the delivery of housing and improve the overall configuration of sports space".

Summary of Comments:

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

This Land supports the Cottenham Neighbourhood Plan and its policies, however proposes amendments to policies COH/1.7, 2.1, 4.1 and 4.4.

COMPLETED FORMS MUST BE RECEIVED BY 5PM ON 25 MARCH 2019 AT:

POST: Planning Policy Team, South Cambridgeshire District Council, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

EMAIL: neighbourhood.planning@scambs.gov.uk

Cottenham Neighbourhood Plan - submission consultation

C - 67670 - 28090 - Chapter 4 Conserving the village character - None

67670 Comment

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: South Cambridgeshire District Council (Stephen Kelly) [28090] Agent: N/A

Full Text:

Summary: Policy COH/1-1: Landscape character

a) SCDC supports the aim of the policy to protect views that contribute to the character and attractiveness of Cottenham. It would have been helpful if the selection of views had been supported by evidence setting out how the important views have been selected.

b) It is not clear where criterion d) would apply as development can only provide planting within the application site. If this is the intention then we feel the policy should be clear in its wording.

Attachments: Under rep 67669
Response form
Decision Notice

Cottenham Neighbourhood Plan - submission consultation

C - 67671 - 28090 - Chapter 4 Conserving the village character - None

67671 Comment

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: South Cambridgeshire District Council (Stephen Kelly) [28090] Agent: N/A

Full Text:

Summary: Policy COH/1-2: Heritage Assets

a)It would have assisted the understanding of the policy if evidence had been included to support why applications to demolish pre-1945 buildings are to be treated differently from other buildings in the Conservation Area. It is not clear whether these are the typical buildings described in paragraph 1-2a?

b)The wording in the part a) of this policy is confusing. By linking the two elements of part a) of this policy with the word 'or' the policy as drafted could allow for buildings in a good state of repair to be demolished as long as the replacement building uses the reclaimed materials. Is this the intention of the policy?

Attachments: **Under rep 67669**
Response form
Decision Notice

Cottenham Neighbourhood Plan - submission consultation

C - 67672 - 28090 - Chapter 4 Conserving the village character - None

67672 Comment

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: South Cambridgeshire District Council (Stephen Kelly) [28090] Agent: N/A

Full Text:

Summary: Policy COH/1-3: Non-designated heritage assets

SCDC supports the identification of such assets in the Plan. We feel that a larger scale map showing clearly the location and extent of each asset would assist the user of the Plan to identify whether a proposal might impact on a building in the policy.

Attachments:

Decision Notice
Response form

Under rep 67669

Cottenham Neighbourhood Plan - submission consultation

C - 67673 - 28090 - Chapter 4 Conserving the village character - None

67673 Comment

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: South Cambridgeshire District Council (Stephen Kelly) [28090] Agent: N/A

Full Text:

Summary: Policy COH/1-4: Village Character - alterations and extensions

It would have benefited the supporting text to this policy if both the Village Design Statement SPD and the AECOM Heritage and Character Assessment had been more fully referenced.

Attachments: Under rep 67669
Response form
Decision Notice

Cottenham Neighbourhood Plan - submission consultation

C - 67674 - 28090 - Chapter 4 Conserving the village character - None

67674 Comment

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: South Cambridgeshire District Council (Stephen Kelly) [28090] Agent: N/A

Full Text:

Summary: Policy COH/1-5: Village character - new build

SCDC support the overall object of this policy to provide guidance for new buildings so that they can enrich the character of Cottenham. However, the policy as written would result in a terrace of four dwellings potentially failing this policy despite such a proposal positively adding to the street scene. Is this the intent of the Policy?

Attachments: **Under rep 67669**
Decision Notice
Response form

Cottenham Neighbourhood Plan - submission consultation

C - 67675 - 28090 - Chapter 4 Conserving the village character - None

67675 Comment

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: South Cambridgeshire District Council (Stephen Kelly) [28090] Agent: N/A

Full Text:

Summary:

Policy COH/1-6: Village character - the village core or centre

a) This would benefit from a larger scale map to identify clearly the four focal points in the village. Figure 11 is of too small a scale.

b) It is difficult to see how the criteria in the policy will be achieved as many of the requirements are not deliverable as they are reliant on others to deliver (E.g. County highways). Also the focal points and centre are within the village core with limited space for extra features.

c) The identification of the four focal points was not included in the Regulation 14 consultation and it is unclear as to whether the local community has not had the opportunity to comment on the policy or the focal points identified.

Attachments: **Under rep 67669**

Decision Notice
Response form

Cottenham Neighbourhood Plan - submission consultation

C - 67676 - 28090 - Chapter 4 Conserving the village character - None

67676 Comment

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: South Cambridgeshire District Council (Stephen Kelly) [28090] Agent: N/A

Full Text:

Summary: Policy COH/1-7: Local Green Space (LGS)

a)SCDC welcomes the policy but its wording is not clear. The policy includes both a revised boundary to a LGS designated in the Local Plan and a new LGS assessed in the neighbourhood plan. The justification for both of these sites is included in the supporting text to the policy which is to be welcomed.

b)The supporting text does not mention the adopted LGS policy NH/12 in the Local Plan which would help to put in context this specific local policy.

c)It would help the understanding of the policy greatly if a larger and more detailed map was included to identify both LGSs - the revised boundary for the Recreation Ground and the new boundary for the Les King Wood - Figure 12 is very confusing.

Attachments: **Under rep 67669**
Decision Notice
Response form

Cottenham Neighbourhood Plan - submission consultation

C - 67677 - 28090 - Chapter 4 Conserving the village character - None

67677 Comment

Chapter 4 Conserving the village character

Chapter 4 Conserving the village character

Respondent: South Cambridgeshire District Council (Stephen Kelly) [28090] Agent: N/A

Full Text:

Summary: Policy COH/1-8:Protected Village Amenity Areas (PVAA)

a) The supporting text to this policy would benefit from having mention of the relevant policy in the Local Plan - Policy NH/11: Protected Village Amenity Areas.

b) There does not appear to be a justification for including The Dunnocks as a new PVAA. It does not appear in the VDS as open space valued by the community.

Attachments: Under rep 67669
Decision Notice
Response form

Cottenham Neighbourhood Plan - submission consultation

O - 67636 - 28677 - Chapter 5 Providing more housing - None

67636 Object

Chapter 5 Providing more housing

Chapter 5 Providing more housing

Respondent: Mr Peter Hewitt [28677]

Agent: N/A

Full Text:

CHAPTER 5 COMMENTS

5.10 The AECOM report of 2017, predates the planning approvals which have subsequently been granted for some 530 homes. The 91 "affordable homes" identified in the AECOM report need to be adjusted to take account of the provisions for affordable homes which have been made as part of the 530 home planning approvals.

5.11 The "need" for 91 affordable homes is not justified due to the issues made in the discussion above. In addition to this the SEA produced by AECOM and published in Oct 2018, highlighted the need for 1 and 2 bedroom flats, but this has not been taken into account by the Parish Council, even though the SEA report postdates the 530 home planning permissions and contains more accurate data on the "need" in Cottenham.

"Meeting the need" Section

* The logic in this section is flawed as the conclusion reached in the later part of the segment are not based on the information provided at the beginning. In item 5.20 confirms the planning approvals for 530 homes and that the locally assessed objective was exceeded by more than 100 homes. Item 5.23 goes on to confirm that from the 520 homes 90 affordable homes would be made available as part of these planning permissions, meaning the AECOM 2017 assessment of 91 will have been met, this is particularly the case when the flats included in item 5.22 are taken into account.

* Item 5.24 the Parish Council make the statement that affordable homes are not locally affordable but provides no justification for why they disagree with the SCDC definition. The Parish Council provides no definition for what "locally affordable" means and given no opportunity for it to be debated.

* In item 5.25 SCDC identified 91 local households fall between local authority intervention and the ability to afford local homes at market rates. However, this does not define the ability of these local householders to afford, "affordable" homes and "locally affordable" homes. In item 5.26 it is stated that AECOMs assessed need is for 91 "locally affordable" homes, however the AECOM report does not use the term "locally affordable", in fact in the AECOM report summary table 39 the report says "...there is no requirement for the Cottenham neighbourhood plan to set its own policy in this area...".

* In summary a report that predates the recent 530 home planning permission should not be used to justify the conclusions of the housing need, unless it is updated by AECOM to take these planning permissions into account. If the AECOM report is not to be updated then the conclusions should take into account the recommendations of the more recent SEA to build 1 or 2 bed flats and prorate the 91 affordable home requirement to take into account people who can afford "affordable" homes and "locally affordable" homes.

Item 5.30, the consultation pre-dates the 530 home planning permissions and therefore does not take into consideration changes in Cottenham residents thoughts now that permission has already been granted for 530 new homes.

Page 39, COH 2-2b states, "Cottenham is particularly vulnerable to flood risk...", which raises the question why is one of the rural exception sites being promoted by the NP when it is actually on the flood plain. Not that any of this is readily apparent from the NP as actual details of the rural exception sites are almost entirely absent.

Page 41, COH 2-3, fig 14 underestimates the number of 1 or 2 bed flats could be built at these locations and therefore the contribution which could be made to the "locally affordable" need.

Page 43, COH 2-4, this has not been updated to take account of the 530 home planning permissions, which means the need for 225 homes identified in 2-4d has already been met, meaning this policy no longer has any justification.

General comment: whilst elsewhere in the NP significant detail is given for other proposed developments (Durman Stearn site for instance) with layout plans and location details, no such information is given for the Rural Exception sites. It is not possible to tell from the NP submitted to SCDC that one of the preferred sites (Broad Lane) is on the flood plain, which directly contradicts the appendix C Drainage and Flooding requirements. It also removes the ability for anybody commenting on the NP to comment directly on the individual rural exception sites, which seems odd given how important the rural exception sites are to the NP housing policy and in particular, given that approval of the NP would effectively give the Parish Council approval to develop the rural exception sites in accordance with Policy COH 2-4. This also hides the fact that to build the 91 "locally affordable" homes using the CLT model could lead to the need to build an additional 250 homes if the example of Stretham CLT is used as a guide, where two thirds market rate houses were needed to fund the one third affordable homes. It seems unlikely that the NP would get a warm welcome if it was known to be promoting 250 new homes in addition to the 530 home already granted planning permission.

Summary:

Chapter 5 Does not take into account the 530 houses which have recently been granted planning permission when assessing the housing need and continues to promote houses when the need is for 1 and 2 bedroom flats. The location of the preferred rural exception sites is vague and hides that one of the sites is actually on the Flood Plain in contravention of Appendix C of the NP.

Attachments:

Cottenham Neighbourhood Plan - submission consultation

C - 67637 - 27541 - Chapter 5 Providing more housing - None

67637 Comment

Chapter 5 Providing more housing

Chapter 5 Providing more housing

Respondent: Anglian Water Services Limited (Stewart Patience) **Agent:** N/A
[27541]

Full Text: Policy H/1 Large site design - criterion (e)
Reference is made to new residential developments of 50 dwellings or more making use of sustainable drainage systems.

Anglian Water fully supports the provision of Sustainable Drainage Systems (SuDS) in new development so as not to increase flood risk and to reduce flood risk where possible. The use of SuDS would help to reduce the risk of surface water and sewer flooding.

The policy as drafted appears to limit the use of SuDS to residential development sites of 50 dwellings or more as highlighted in our previous consultation response. This is inconsistent with Policy CC/8: Sustainable Drainage Systems of the adopted South Cambridgeshire Local Plan which requires new development proposals to incorporate SuDS appropriate to nature of the site.

We would ask that the requirement for the inclusion of SuDS be amended to make it clear that the use of SuDS in development within the Parish is not limited to residential sites of 50 dwellings or more and applies to all development proposals within the Parish.

Summary: Policy H/1 Large site design - criterion (e)

We would ask that the requirement for the inclusion of SuDS be amended to make it clear that the use of SuDS in development within the Parish is not limited to residential sites of 50 dwellings and applies to all development proposals within the Parish.

Attachments:

Cottenham Neighbourhood Plan - submission consultation

C - 67641 - 4554 - Chapter 5 Providing more housing - None

67641 Comment

Chapter 5 Providing more housing

Chapter 5 Providing more housing

Respondent: Environment Agency (Mr Tony Waddams) [4554] Agent: N/A

Full Text:

Summary: Applaud council's decision to seek Brownfield sites for development allocations. Clearly you are aware of the associated constraints.

Need to consider following:

- * Flood Risk & Flood risk Assessments (FRA):
- * Potential Ground Contamination:
- * Surface Water drainage:
- * Foul Water Drainage:

Attachments:

Representation

Caroline Hunt
Planning Policy Manager
South Cambridgeshire District Council
South Cambridgeshire Hall (6010)
Cambourne Business Park
Cambourne
Cambridge
CB3 6EA

Our ref: AC/2018/126930/04-L01
Your ref: 180323/RML07
Date: 14 February 2019

Dear Sir/Madam

NEIGHBOURHOOD PLAN AT COTTENHAM. FEBRUARY 2019 PUBLIC CONSULTATION.

Thank you for your consultation.

Environment Agency position.

We applaud the council's decision to seek Brownfield sites for development allocations. Clearly you are aware of the associated constraints and to this end we would offer the following comments and informatives.

Flood Risk & Flood risk Assessments (FRA):

Particular attention should be paid to the Technical Guidance to the National Planning Policy Framework (NPPF).

It is essential that any allocation site satisfies the requirement of the NPPF including the following;

- The Sequential and Exception Tests
- Appropriateness of proposed use in line with Table 2: Flood risk vulnerability classification, and Table 3: Flood risk vulnerability and flood zone 'compatibility'
- Flood risk assessment. Individual site specific contemporary FRA's will be required to support any subsequent planning application.
- Any FRA should acknowledge that our National Flood mapping is *Indicative* not *Definitive* hence the need for individual site specific FRA's.

Where a proposed allocation is identified as being at flood risk the FRA should also consider;

- Betterment in terms of impact on floodplain and safeguarding life and property
- Flood resilience and resistance construction
- Flood warning
- Personal site flood plan
- Access/egress/Emergency evacuation – the councils Emergency planner will comment upon these issues.

Floodrisk assessments should be undertaken by a suitably qualified person. We cannot recommend consultants but a simple web search may help you to find a competent individual or company.

Potential Ground Contamination:

In view of the brownfield nature of the sites, potential ground contamination must be thoroughly investigated and remediation measures, where necessary, agreed upfront of any redevelopment, including in some instances demolition works.

The National Planning Policy Framework (NPPF) takes a precautionary approach to land contamination. Before the principle of development can be determined, land contamination should be investigated to see whether it could preclude certain development due to environmental risk or cost of clean-up (remediation).

Where contamination is known or suspected a desk study, investigation, remediation and other works may be required to enable safe development (Paragraph 121 of the NPPF). Our minimum requirements for submission with a planning application, where contamination is suspected, are a desk study and preliminary risk assessment such as a site walkover or conceptual model.

Contaminated land assessments should be undertaken by a suitably qualified person. We cannot recommend consultants but a simple web search may help you to find a competent individual or company.

Further contaminated land guidance can be found at:

NPPF: Land affected by contamination - <https://www.gov.uk/guidance/land-affected-by-contamination>

Groundwater protection guides on GOV.UK:

<https://www.gov.uk/government/collections/groundwater-protection>

Surface Water drainage:

Where appropriate we recommend that the use of Sustainable Drainage Systems (SuDS). These techniques can provide a method for reducing runoff that could otherwise lead to flooding. They can also minimise pollution impacts, improve biodiversity and provide amenity areas. Please be aware that we are no longer a statutory consultee for surface water flood risk.

If infiltration drainage is proposed then it must be demonstrated that it will not pose a risk to groundwater quality. We consider any infiltration SuDS greater than 2.0 m below ground level to be a deep system and generally not acceptable. All infiltration SuDS require a minimum of 1.2 m clearance between the base and peak seasonal groundwater levels. In addition, they must not be constructed in ground affected by contamination.

All SuDS need to meet the criteria set out in our Groundwater Protection: Principles and Practice (GP3) document; this document details our approach to the management and protection of groundwater. Further SuDS guidance can be found at:

Groundwater protection guides on GOV.UK:

<https://www.gov.uk/government/collections/groundwater-protection>

NPPF Planning Practice Guidance: why are SuDS important?

<https://www.gov.uk/guidance/flood-risk-and-coastal-change#flood-risk-opportunities>

Foul Water Drainage:

Foul Water Drainage hierarchy.

Other than very exceptionally, providing non-mains drainage as part of your Planning or Building Regulation application will not be allowed unless you can prove that a connection to the public sewer is not feasible. Non-mains drainage systems are not considered environmentally acceptable in publicly sewered areas. Please note that the existence of capacity or other operating problems with the public sewer are not valid reasons for non-connection where this is reasonable in other respects.

Where connection to the public sewer is feasible, agreements may need to be obtained either from owners of land over which the drainage will run or the owners of the private drain.

Government guidance contained within DETR Circular 03/99/ WO 10/99 'Planning requirements in respect of the use of non-mains sewerage incorporating septic tanks in new development' gives a hierarchy of drainage options that must be considered and discounted in the following order:

- 1 Connection to the public sewer.
- 2 Package sewage treatment plant (which can be offered to the Sewerage Undertaker for adoption).
- 3 Septic Tank.
- 4 If none of the above is feasible a cesspool may be appropriate.

The applicant should be aware of his responsibility to maintain the system to the manufacturer's requirements and environmental regulations.

Consent for the discharge of effluent may be required from us. Further information can be found at <https://www.gov.uk/permits-you-need-for-septic-tanks>. This is irrespective of any planning approval.

Other Environmental Issues:

In the event that the Agency's is formally consulted by the local planning authority in respect of any subsequent planning application we are likely to make further comments and recommendations in respect of other environmental issues.

Please be advised that the comments contained within this correspondence represent the informal opinion of an officer of the Environment Agency. These comments are not intended to be conclusive and are made without prejudice to any subsequent response to the local planning application to a formal planning consultation.

Yours faithfully


Planning Liaison



Please note – Our hourly charge for pre application assessments is currently £100 + VAT

Environment Agency, East Anglia Area (West), Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE.

www.gov.uk/environment-agency

Cottenham Neighbourhood Plan - submission consultation

O - 67646 - 28499 - Chapter 5 Providing more housing - None

67646 Object

Chapter 5 Providing more housing

Chapter 5 Providing more housing

Respondent: Cambridgeshire County Council (Mr Colum Fitzsimons) [28499]

Agent: N/A

Full Text:

Summary: Policy COH/2.1: Development Framework

Seeking an amendment to Policy COH/1-7 and COH/2-1 to facilitate the provision of primary education facilities in the village.

Attachments:

Plan
Representation

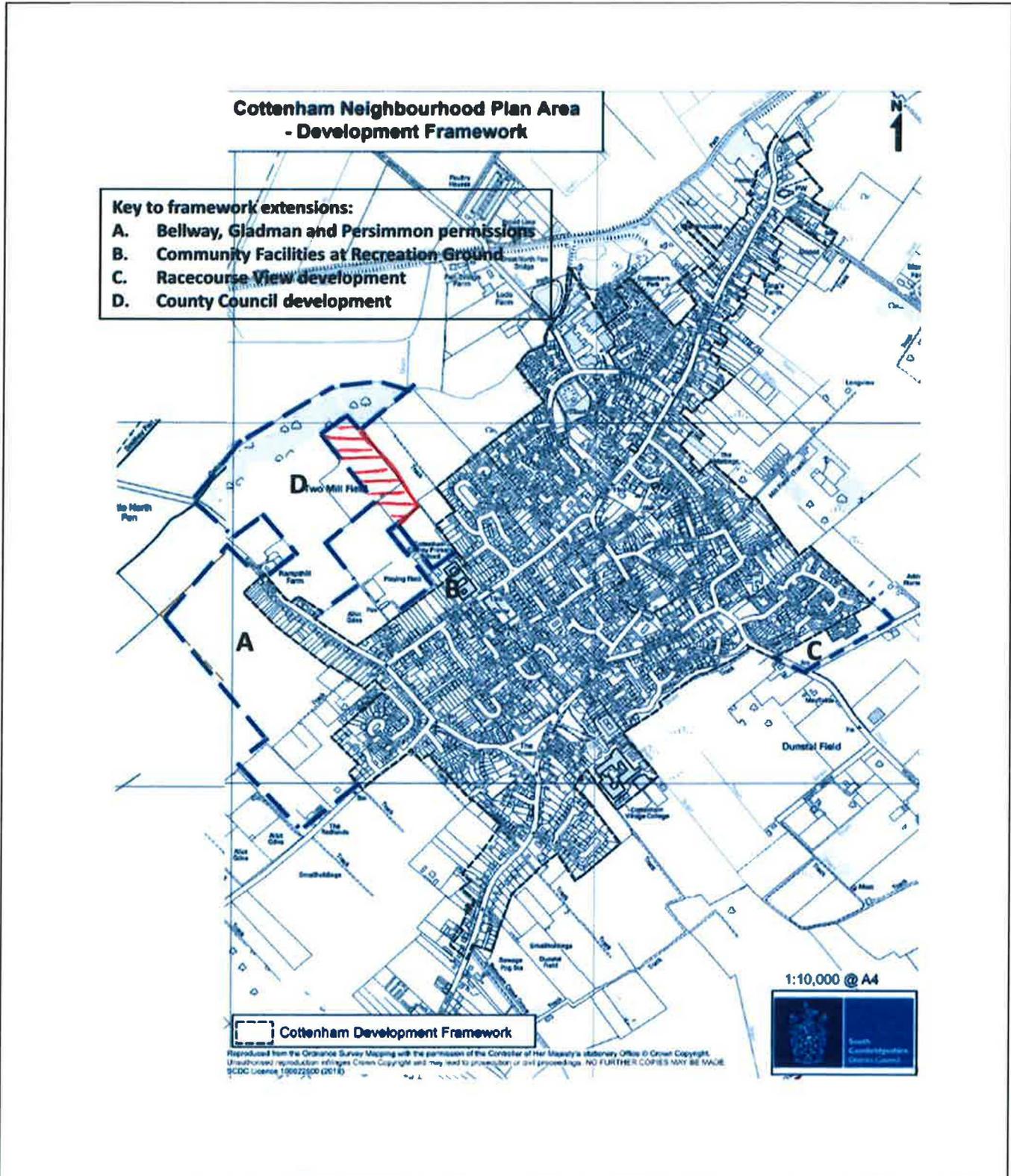


Figure 15: Cottenham’s Development Framework

Cottenham Neighbourhood Plan (Submission Plan): Representation by Cambridgeshire County Council

Policy COH/1-7 proposes an amendment to the Local Green Space designation at King George V Playing Fields to support the provision of community facilities. Policy COH/2-1 and Figure 15 extend the Development Framework boundary to include the land to the north of the Sports and Social Club buildings. This is described as “B” on the Figure 15. The County Council supports this as it will enable the expansion of the community facilities at this location.

Part of the wider strategy for housing development in the village is to ensure that primary school facilities can be created to meet the increased demand as a consequence of this new development. The County Council intends to meet this demand by expanding primary provision on the land immediately to the northwest of the existing playing fields at Cottenham Primary School. This strategy was evident in the consideration of the planning applications in this part of the village and most recently the application by Cambridgeshire County Council which identifies the land for primary school expansion and makes provision for access to it through the permitted development site.

This land is currently identified in the South Cambridgeshire Local Plan (Policy NH12-021) as Local Green Space and lies outside the Development Framework boundary. The effect of this will limit the ability for the County Council to deliver the enhanced primary education for the village. The County Council considers that Policy COH/1-7 should be amended as follows:

Policy COH/1-7: Local Green Space

In addition to the sites designated as Local Green Space in the Local Plan, this plan:

- a) alters the designated LGS boundary of the Recreation Ground (NH/12-21), including King George V Playing Field and the Primary School Expansion Land, as shown in figure 12, to:**
 - i. provide for Community Facilities and Primary Education Facilities described elsewhere in this plan and for which the need has increased as a result of development identified in this plan, and**
 - ii. improve the overall configuration of sports space**
- b) adds part of Les King Wood (figure 12) as designated Local Green Space where development will not be allowed except in very special circumstances; the connectivity and importance of this woodland to the community has increased as a result of development identified in this plan**

A further amendment to Policy COH/2-1 should also be made to the Development Framework boundary to include the primary school expansion land for the same reason that the boundary change at “B” facilitates other the provision of community facilities.

Policy COH/2-1: Development framework

The development framework for Cottenham should be extended (as shown in figure 15) to identify where development necessary to meet Cottenham’s assessed housing need and primary education requirements directly arising from this development should be permitted.

Land outside this boundary will be considered as rural and planning applications will be subject to countryside policies unless specific policies apply as set out in this plan or the Local Plan.

Figure 15 should also be changed to include the primary school expansion land as indicated on the attached plan.

Seeking an amendment to Policy COH/1-7 and COH/2-1 to facilitate the provision of primary education facilities in the village.

Cottenham Neighbourhood Plan - submission consultation

O - 67647 - 28710 - Chapter 5 Providing more housing - None

67647 Object

Chapter 5 Providing more housing

Chapter 5 Providing more housing

Respondent: Southern & Regional Developments (Mr Andrew Dutton) [28710]

Agent: Claremont Planning Consultancy (Katherine Else) [28712]

Full Text:

Summary: The policy approach of the Neighbourhood Plan for housing delivery and the identification of sites for residential development is unsound.

Attachments:

Response form

PART B – Your Response

For office use only

Agent number:

Representor number:

Representation number:

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

Policy or Paragraph Number (Please state)	Part 5 Providing more Housing
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.

Part 5 of the emerging Neighbourhood Plan makes provision for the delivery of housing in the village over the Plan Period. The emerging Local Plan does not currently make any allocations or attribute any numbers for delivery at the settlement, rather the emerging Neighbourhood Plan, to deliver such allocations, commissioned a housing needs assessment. This assessment took into account varying sources of evidence and identified that 400 dwellings were required over the NP plan-period, as quoted in paragraph 5.9 of the emerging Neighbourhood Plan. This is despite the AECOM Housing Need Assessment for Cottenham identifying an unconstrained housing requirement for 568 additional homes before any economic uplift is applied, which increases the requirement to 670 dwellings. The demand for housing is further exacerbated by the need for affordable homes, with a need for 261 affordable homes identified by the AECOM report over the plan period. This is fairly proportionate to the generated need figure of 670 dwellings, with 40% of that level of provision satisfying the affordable home requirements. Therefore, Claremont Planning fails to understand how the NP under provision housing figure of 400 dwellings has been justified, particularly in respect of the evidence base of housing need provided to inform the NP. Paragraph 31 of the Revised NPPF advises that all development plan documents must be underpinned by an up-to-date evidence base and there is no demonstration that the proposed 400 dwelling level of delivery set out in the NP has been based upon the available evidence. Actions appear to have been taken to overly constrain the level of housing to be delivered at Cottenham, contrary to the documented local housing need, the Local Plan's aspirations for the settlement to accommodate development and the NPPF's maintained guidance that housing delivery and level of provision should be boosted through planning policy and decision making. As the emerging NP fails to present a deliverable housing target that is based upon recognised evidence and has not waited for a scale of development from the Greater Cambridge Local Plan; it fails to deliver sustainable development and meet the basic conditions.

This is particularly detrimental given the current vibrancy of Cambridge's economy, which in turn has resulted in a cascade effect upon South Cambridgeshire, and as such, increased the attraction of the area and housing requirements as a whole. From this effect it can be presumed that people growing up in an areas such as Cottenham will be more likely to want to stay and live there with job opportunities and facilities improving in the Cambridge area. The NP's curtailment of the documented housing need through an under-provision of housing will curtail the ability of the village to accommodate residents in the future or address the substantiated affordable housing needs. This will stifle the economic vibrancy of Cottenham and will fail to meet the future needs of its community.

Claremont Planning are however of the opinion that where the emerging NP states in paragraph 5.3 that Cottenham is a 'less' sustainable settlement to justify the lack of allocations at the village through the

emerging Local Plan, this is incorrect in its presumption. The South Cambridgeshire Local Plan Policy S/8 recognises Cottenham as a Rural Centre which are established as; “the largest, most sustainable villages of the district.” This is in direct contravention with the Neighbourhood Plan at paragraph 5.3 where it states that due to the ‘less’ sustainable position of the village the Local Plan has made no allocations at the settlement. It is advanced that it is the responsibility of the NP to make residential allocations, particularly as it is progressing ahead of the Greater Cambridge Local Plan and should be in line with the context of the emerging policy which recognises Cottenham as a sustainable settlement. Indeed, the settlement hierarchy and sustainability assessment of the village through the emerging Local Plan does provide a basis for development at the village reflecting Cottenham’s position as a higher order, rural settlement. Housing delivery at the village should be of a scale that fully addresses its own needs as well as the wider boost in housing delivery across Cambridgeshire, which is a requirement of the Local Plan and therefore should be reflected in the NP through sufficient housing provision and site allocations. Housing allocations directly adjacent to the development framework of the settlement should be viewed as a sustainable approach, especially where a proposal can demonstrate a cohesive and logical relationship to existing built form. Currently the NP fails to make sufficient housing allocations, relying upon windfall consented schemes and manipulating its housing requirement to reflect the scale of development already consented and so avoid the need for further allocations. This is fundamentally flawed and contradicts the plan-led approach that Neighbourhood Plans provide for local communities, failing those that have identified needs for affordable homes or different types of housing and restricting development unnecessarily at Cottenham over the whole of the plan period.

It must be recognised that the emerging NP deems that the housing requirement of the village is satisfied through the consent of up to 530 dwellings across four separate sites. However, it is advanced that the weight that the Neighbourhood Plan attributes to these consents is misplaced given the reliance of 66% of the total dwellings consented upon Outline permissions, (the Gladman site has up to 200 dwellings and the Cambridgeshire County Council site has up to 154 dwellings). Whilst it is acknowledged that the precedent of development has been set through the issue of outline consent, it does not however provide a firm timeline for the delivery of these dwellings, assure their viability or provide definitive layouts of their housing capacity. Delivery of the approved housing numbers therefore cannot be assured at present and the NP should take this into account in terms of their identified numbers and how this could fail to meet the identified needs. The masterplans advanced as part of these Outline consents are only indicative as to what can be delivered on site, and commonly reflect inappropriate densities that impact on the net number of dwellings that are realistically deliverable.

Summary of Comments:

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

The policy approach of the Neighbourhood Plan for housing delivery and the identification of sites for residential development is unsound.

COMPLETED FORMS MUST BE RECEIVED BY 5PM ON 25 MARCH 2019 AT:

POST: Planning Policy Team, South Cambridgeshire District Council, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

EMAIL: neighbourhood.planning@scambs.gov.uk

Cottenham Neighbourhood Plan - submission consultation

O - 67649 - 28710 - Chapter 5 Providing more housing - None

67649 Object

Chapter 5 Providing more housing

Chapter 5 Providing more housing

Respondent: Southern & Regional Developments (Mr Andrew Dutton) [28710]

Agent: Claremont Planning Consultancy (Katherine Else) [28712]

Full Text:

Summary: Policy COH/2-1: Development Framework

The proposed development framework of Cottenham does not take into account defensible features and assets. The site at Broad Lane should be included.

Attachments:

Response form

PART B – Your Response

For office use only

Agent number:

Representor number:

Representation number:

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

Policy or Paragraph Number (Please state)	Policy C0H/2-1
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.

As has been made clear, the promotion sites will be able to contribute towards the provision of a new settlement boundary to the north, by making use of the site coming forward to the west and the provision of new public open space and landscape buffers associated with this site and the site in question being promoted. It is exhorted that Figure 15 of the emerging Neighbourhood Development Plan is inaccurate in demonstrating the extent of the sites with outline consent and therefore does not establish a clear representation as to how the promotion site can link in coherently with these new development sites.

The relationship between the site coming forward on the County Council land and the residential schemes to the west of the village will be able to form a coherent and new edge to the village. In particular, the land associated with the County Council consented development will provide new sports and amenity spaces, as well as land safeguarded for the extension of the primary school. This land, along with the promotion sites, will enclose the amenity area within the village, contributing positively to the local community, as use for the existing, and future, residents of Cottenham. A landscape buffer, connecting the promotion sites and the County Council site will provide an established and defensible edge to the northern boundary of the extended village and ensure that views from and towards the new developments are maintained as far as possible.

Claremont Planning suggests a revised settlement boundary for Cottenham, taking into account the new sites at the County Council and the housebuilder sites to the south west. The boundary will encapsulate the promotion site as well as the Broad Lane recreation ground, which rounds-off the settlement well where Broad Lane meets the Cottenham Lode. This forms a new limit, where the settlement's growth will be prevented from extending any further north than this point. The new boundary in the north would be set back from the Lode and with it characterised by comprehensive, but sensitive, landscaping, the extended village will not cause any detriment to the fenland landscape.

By making use of the open space within the County Council outline site and its relationship with the promotion site at Broad Lane, the landscape buffer will form a new settlement boundary to the north, protecting the vistas towards the Great North Fen and the Cottenham Lode. It is recognised that this area of land has been allocated as Local Green Space which will reinforce this buffer and is an approach which is supported by Claremont Planning. This will prevent the possibility of the village spreading north, over the Lode and intruding into fenland.

Summary of Comments:

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

The proposed development framework for Cottenham does not take into account defensible features and assets. The site at Broad Lane should be included.

COMPLETED FORMS MUST BE RECEIVED BY 5PM ON 25 MARCH 2019 AT:

POST: Planning Policy Team, South Cambridgeshire District Council, Cambourne Business Park,
Cambourne, Cambridge, CB23 6EA

EMAIL: neighbourhood.planning@scambs.gov.uk

Cottenham Neighbourhood Plan - submission consultation

O - 67650 - 28710 - Chapter 5 Providing more housing - None

67650 Object

Chapter 5 Providing more housing

Chapter 5 Providing more housing

Respondent: Southern & Regional Developments (Mr Andrew Dutton) [28710]

Agent: Claremont Planning Consultancy (Katherine Else) [28712]

Full Text:

Summary: Policy COH/2-2 Large site design

The Neighbourhood Plan should not overly constrain the delivery of important large sites through stringent policy requirements.

Attachments:

Response form

PART B – Your Response

For office use only

Agent number:

Representor number:

Representation number:

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

Policy or Paragraph Number (Please state)

Policy C0H/2-2

Do you Support, Object or have Comments?
(Please tick)

- SUPPORT**
 OBJECT
 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.

Given that the NP deems the extant permissions will meet the recognised need, the emerging policy focuses upon how it is able to manage this development moving forward. Claremont Planning agree, to an extent, with the requirements of Policy C0H/2-2 Large Site Design where it states that accessibility and drainage are key concerns for any large site coming forward. This policy seeks to influence the outline permissions which have design and layout as reserved matters for later agreement. It is exhorted to the Parish that whilst this policy will be able to influence the developments and so suit the village in a more cohesive way, it will also constrain these sites coming forward if these requirements are excessively applied to any design proposal. This is particularly important given the poor housing land supply that the District Council can demonstrate and the substantial development pressures arising within this sub-region of Cambridgeshire, with the particular local pressure from Cambridge and the city's rapid economic growth.

Summary of Comments:

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

The Neighbourhood Plan should not overly constrain the delivery of important, large sites through stringent policy requirements.

COMPLETED FORMS MUST BE RECEIVED BY 5PM ON 25 MARCH 2019 AT:

POST: Planning Policy Team, South Cambridgeshire District Council, Cambourne Business Park, Cambourne, Cambridge, CB23 6EA

EMAIL: neighbourhood.planning@scams.gov.uk