

Record count: 51

56534

Support

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Natural England

Date received: 07/10/2021 via Email

Summary:

Natural England does not have any specific comments on this Neighbourhood Plan submission.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4ss>

56535

Support

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** Cambridgeshire Local Access Forum**Date received:** 21/10/2021 via Email**Summary:**

Cambridgeshire Local Access Forum (CLAF) was established through statutory provisions of Countryside and Rights of Way Act 2000

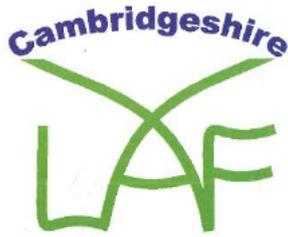
CLAF welcomes opportunity to provide input into Gamlingay Neighbourhood Plan and how it might be revised and improved to better reflect existing and potential future use of non-motorised transport network across Parish of Gamlingay.

We recognise that it's a very comprehensive plan, with a lot of concern for biodiversity, historical sites, and conservation.

We are also pleased to see and support policies that aim to protect, enhance and develop the rights of way network providing a network of routes to promote walking, cycling and riding and to point out that circular routes, or routes that link with others, are particularly recommended.

The CLAF would be happy to discuss further our concerns and how we might help in achieving the plans ambition.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4st>



Cambridgeshire Local Access Forum

Chair: [REDACTED]
c/o Cambridgeshire County Council
Biodiversity & Greenspaces Team
Alconbury Weald Civic Hub
Emery Crescent
Enterprise Campus
Alconbury Weald
PE28 4YE

Tel: [REDACTED]
Email: claf@cambridgeshire.gov.uk

Thursday 21st October 2021

Gamlingay Neighbourhood Plan consultation

To whom it may concern:

The Cambridgeshire Local Access Forum (CLAF) was established through the statutory provisions of the Countryside and Rights of Way Act 2000 and its remit is to advise relevant bodies as defined in Section 94(4) of the Countryside and Rights of Way Act 2000 on matters relating to access to the countryside. Section 94(4) bodies are required by the legislation to take the views of the Local Access Forum into account.

The Cambridgeshire LAF welcomes this opportunity to provide input into the Gamlingay Neighbourhood Plan and how it might be revised and improved to better reflect the existing and potential future use of the non-motorised transport network across the Parish of Gamlingay.

We recognise that it's a very comprehensive plan, with a lot of concern for biodiversity, historical sites, and conservation. We are also pleased to see and support policies that aim to protect, enhance and develop the rights of way network providing a network of routes to promote walking, cycling and riding and to point out that circular routes, or routes that link with others, are particularly recommended.

The CLAF would be happy to discuss further our concerns and how we might help in achieving the plans ambition.

Yours sincerely,

[REDACTED]

[REDACTED] (Chair)

56536

Support

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: National Grid

Agent: Avison Young

Date received: 29/10/2021 via Email

Summary:

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s3>

Our Ref: MV/ 15B901605

29 October 2021

South Cambridgeshire District Council
neighbourhood.planning@greatercambridgeplanning.org
via email only

Dear Sir / Madam

**Gamlingay Neighbourhood Plan Regulation 16 Consultation
September – November 2021
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.



Distribution Networks

Information regarding the electricity distribution network is available at the website below:
www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

[Redacted]

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

[Redacted]

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

[Redacted]ours faithfully,

[Redacted signature]

[Redacted]

Director

[Redacted]

[Redacted]

For and on behalf of Avison Young

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

56537

Support

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Cambridgeshire County Council

Agent: Carter Jonas

Date received: 19/11/2021 via Email

Summary:

Objective 1 Housing Growth

Objective 1 recognises the need for appropriate housing growth in Gamlingay including the need for smaller and adaptable homes. This is supported.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s4>

56538

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Cambridgeshire County Council

Agent: Carter Jonas

Date received: 19/11/2021 via Email

Summary:**OBJECTIVE 4: COMMUNITY AMENITIES AND FACILITIES**

The supporting text to Objective 4 advises that Policy GAM7 designates the former First School Playing Field as new Local Green Space with pedestrian access. It also advises that Policy GAM8 supports development of the former First School buildings for educational and community uses and safeguards the site for 10 years. Cambridgeshire County Council objects to Policies GAM7 and GAM8 under basic conditions A, D and E, see representations submitted in respect of Policies GAM7 and GAM8 below. Thus, Cambridgeshire County Council also objects to the supporting text to Objective 4 under the same basic conditions.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s4>

56539

Support

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** Cambridgeshire County Council**Agent:** Carter Jonas**Date received:** 19/11/2021 via Email**Summary:**

PARAGRAPHS 4.12 and 4.13

Paragraph 4.12 advises that the Bedfordshire Rural Communities Charity (BRCC) Housing Needs Survey Report (2018) indicates a particular demand for smaller 1-2-bedroom homes and bungalows in Gamlingay to meet the needs of single people requiring accommodation on their own, as well as older people seeking to downsize. Paragraph 4.13 recommends developers focus on less expensive, smaller, and adaptable 2 to 3- bedroom houses and bungalows. Cambridgeshire County Council supports the provision of smaller homes which could be explored as part of a mixed-use scheme at the former First School site.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s4>

56540

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** Cambridgeshire County Council**Agent:** Carter Jonas**Date received:** 19/11/2021 via Email**Summary:****PARAGRAPH 4.60**

Paragraph 4.60 advises that there is a shortfall of places for care of children during their early years in Gamlingay. It goes on to state that the existing former First School buildings would provide an ideal location for pre-school care. Policy GAM8 is proposing the reuse of the buildings on the former First School site for educational and community purposes where a need (e.g. for pre-school provision, a new doctors' surgery or relocation of the Coop) can be met.

Cambridgeshire County Council objects to Paragraph 4.60 under basic conditions A, D and E (see representations submitted in respect of Policy GAM8). Cambridgeshire County Council acknowledges its duty to provide pre-school places. However, while a detailed feasibility study of the site has not yet been carried out, based on experience in the area it is considered likely that a sole pre-school use would not be viable. Also, due to the size of the buildings multiple site occupants would be required. To produce an effective whole site solution, it is highly likely that a mixed use scheme will be required to support such facilities, however, this should not be restricted to education and community uses. Rather, greater flexibility should be provided to ensure a suitable viable scheme can be developed. This view was expressed by Cambridgeshire County Council as part of the Regulation 14 Consultation.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s4>

56541

Support

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Cambridgeshire County Council

Agent: Carter Jonas

Date received: 19/11/2021 via Email

Summary:

PARAGRAPH 4.62

COMMENT

The former First School field is private land with no public access. Access to the former First School field is only granted through private agreements with Cambridgeshire County Council.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s4>

56542

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** Cambridgeshire County Council**Agent:** Carter Jonas**Date received:** 19/11/2021 via Email**Summary:****GAM6 – COMMUNITY AMENITIES AND FACILITIES**

Policy GAM6 states that the loss of amenities and facilities will be resisted unless it can be demonstrated that efforts have been made to secure their continued use and alternatives are provided. Cambridgeshire County Council objects to Policy GAM6 under basic

Condition A as the policy is not considered clear and unambiguous as required under Paragraph 16(d) of the NPPF and Paragraph 041 (Ref. 41-041-20140306) of the NPPG.

The policy does not define what falls within “amenities and facilities” for the purpose of the policy, or what an applicant is expected to demonstrate to show that “efforts have been made to secure their continued use”. Furthermore, it has not taken into account the

existing level of provision within the settlement. In line with the Local Plan, it is suggested that the wording be updated to “village services and facilities, including village pubs,shops, post offices, banks and building societies, community buildings and meeting

places, sports venues, cultural buildings, places of worship or health facilities, where such loss would cause an unacceptable reduction in the level of community or service provision in the locality”. This change in wording is also required to meet basic condition E (see below).

Policy GAM6 also does not meet basic condition E which requires general conformity with the strategic policies contained in the development plan. This includes Local Plan Policy SC/3: Protection of Village Services and Facilities which seeks to protect village services and facilities. However, as set out above, Policy GAM6 does not include the same definition of facilities and services as Policy SC/3. Furthermore, Policy SC/3 sets out clear guidance on what will be considered in determining the significance of the loss of a village service or facility:

- a) “The established use of the premises and its existing and potential contribution to the social amenity of the local population;
- b) The presence of other village services and facilities which provide an alternative, with convenient access by good local public transport services, or by cycling or walking; and how these remaining uses will cope with displaced users; and any unacceptable impact of those alternative services or facilities;
- c) The future economic viability of the use including the results of marketing of the premises for a minimum of 12 months at a realistic price and in appropriate cases financial information.”

Neighbourhood Plan Policy GAM6 does not provide this clarity which is considered important for the application of the policy. Policy GAM6, therefore, does not conform with Policy SC/3 of the Local Plan.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s4>

Gamlingay Neighbourhood Plan



Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or

neighbourhood.planning@greatercambridgeplanning.org

All comments **must** be received by 5pm on Tuesday 23 November 2021.

Data Protection

We will treat your data in accordance with our Privacy Notices:

www.scams.gov.uk/planning-policy-privacy-notice/. Information will be used by South Cambridgeshire District Council solely in relation to the Gamlingay Neighbourhood Plan.

Please note that all responses will be available for public inspection and cannot be treated as confidential. Representations, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed of future stages of the Gamlingay Neighbourhood Plan?

Please tick: Yes No

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:	N/A	Agent's name:	██████████
Name of organisation: (if applicable)	Cambridgeshire County Council	Name of Agent's organisation: (if applicable)	Carter Jonas LLP
Address:	Box OCT 1228 Shire Hall Castle Hill Cambridge	Agent's Address:	One Station Square, Cambridge
Postcode:	CB3 0AP	Postcode:	CB1 2GA
Email:	c/o Agent	Email:	████████████████████
Telephone:	c/o Agent	Telephone:	██████████
Signature:		Date:	19 November 2021

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representation number:

Part B – Your Response

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

Policy or Paragraph Number (please state)	Objective 1, Objective 4, Paragraphs 4.12 and 4.13, Paragraph 4.60, Paragraph 4.62, Policy GAM6, Policy GAM7 and Neighbourhood Plan Maps (4, 7, 9, 10 and 11), Policy GAM8, Policy GAM10 and Appendix 3, Policy GAM11, Appendix 2, General.
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.

INTRODUCTION

Cambridgeshire County Council, as landowners of the former First School and Playing Fields, supports / objects / comments on the following policies and paragraphs in the Gamlingay Neighbourhood Plan:

- Objective 1 – Supports
- Objective 4 – Objects
- Paragraphs 4.12 and 4.13 – Supports
- Paragraph 4.60 – Objects
- Paragraph 4.62 – Comments
- Policy GAM6 – Objects
- Policy GAM7 and Neighbourhood Plan Maps (4, 7, 9, 10 and 11) – Objects

- Policy GAM8 – Objects
- Policy GAM10 and Appendix 3 – Objects
- Policy GAM11 – Objects
- Appendix 2 – Comments
- General – Comments

Representations made in respect of the above are set out below. Representations made at this stage are limited to whether or not the Neighbourhood Plan meets the basic conditions and other matters that the independent examiner is required to consider under Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) which is applied to neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act 2004. Representations may also address whether the referendum area should be extended beyond the neighbourhood area, and a case can be made for an oral hearing.

It is concluded that the Neighbourhood Plan does not meet basic conditions A, D and E:

- Condition A - having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order [or neighbourhood plan]
- Condition D - the making of the order [or neighbourhood plan] contributes to the achievement of sustainable development
- Condition E - the making of the order [or neighbourhood plan] is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

Therefore, that it should not proceed to referendum or be made without modification.

It is also requested that the examination include a public hearing, under Paragraph 9 of Schedule 4B to the Town and Country Planning Act 1990, to ensure Cambridgeshire County Council has a fair chance to put their case forward. It is important that the points set out in the representations below receive full consideration and that Local Plan is modified appropriately to address the concerns raised.

FORMER FIRST SCHOOL AND PLAYING FIELDS

Cambridgeshire County Council (CCC) are in the process of looking for a whole site solution for the former First School. Their priority is to secure a long-term, viable use. A detailed feasibility study of the site has not yet been carried out, but based on experience in the area, it is considered likely that a residential-led, mixed use proposal would provide the value needed to retain and convert existing buildings. The size and configuration of the buildings would appear to lend themselves well to conversion into smaller homes, and there may be an opportunity to use part of the site for community use, as part of a comprehensive scheme.

Whilst we understand the good intentions of the Neighbourhood Plan in respect of proposing the former First School buildings for education and community uses, the concern that CCC has, as landowner, is whether there is demand / committed interest for such uses, and whether such demand is viable in the long-term. No evidence from the Neighbourhood Plan process has been identified to support full use of the site for community purposes.

The policy priority for this site should be to ensure buildings are protected and re-used for an appropriate use (or mix of uses), and whilst this might start by encouraging community re-use as a policy preference, there should be flexibility within the wording to support alternative uses if a community use cannot be secured.

REPRESENTATIONS

OBJECTIVE 1: HOUSING GROWTH

SUPPORT

Objective 1 recognises the need for appropriate housing growth in Gamlingay including the need for smaller and adaptable homes. This is supported.

OBJECTIVE 4: COMMUNITY AMENITIES AND FACILITIES

OBJECT

The supporting text to Objective 4 advises that Policy GAM7 designates the former First School Playing Field as new Local Green Space with pedestrian access. It also advises that Policy GAM8 supports development of the former First School buildings for educational and community uses and safeguards the site for 10 years. Cambridgeshire County Council objects to Policies GAM7 and GAM8 under basic conditions A, D and E,

see representations submitted in respect of Policies GAM7 and GAM8 below. Thus, Cambridgeshire County Council also objects to the supporting text to Objective 4 under the same basic conditions.

PARAGRAPHS 4.12 and 4.13

SUPPORT

Paragraph 4.12 advises that the Bedfordshire Rural Communities Charity (BRCC) Housing Needs Survey Report (2018) indicates a particular demand for smaller 1-2-bedroom homes and bungalows in Gamlingay to meet the needs of single people requiring accommodation on their own, as well as older people seeking to downsize. Paragraph 4.13 recommends developers focus on less expensive, smaller, and adaptable 2 to 3-bedroom houses and bungalows. Cambridgeshire County Council supports the provision of smaller homes which could be explored as part of a mixed-use scheme at the former First School site.

PARAGRAPH 4.60

OBJECT

Paragraph 4.60 advises that there is a shortfall of places for care of children during their early years in Gamlingay. It goes on to state that the existing former First School buildings would provide an ideal location for pre-school care. Policy GAM8 is proposing the reuse of the buildings on the former First School site for educational and community purposes where a need (e.g. for pre-school provision, a new doctors' surgery or relocation of the Co-op) can be met.

Cambridgeshire County Council objects to Paragraph 4.60 under basic conditions A, D and E (see representations submitted in respect of Policy GAM8). Cambridgeshire County Council acknowledges its duty to provide pre-school places. However, while a detailed feasibility study of the site has not yet been carried out, based on experience in the area it is considered likely that a sole pre-school use would not be viable. Also, due to the size of the buildings multiple site occupants would be required. To produce an effective whole site solution, it is highly likely that a mixed use scheme will be required to support such facilities, however, this should not be restricted to education and community uses. Rather, greater flexibility should be provided to ensure a suitable viable scheme can be developed. This view was expressed by Cambridgeshire County Council as part of the Regulation 14 Consultation.

PARAGRAPH 4.62

COMMENT

The former First School field is private land with no public access. Access to the former First School field is only granted through private agreements with Cambridgeshire County Council.

GAM6 – COMMUNITY AMENITIES AND FACILITIES

OBJECT

Policy GAM6 states that the loss of amenities and facilities will be resisted unless it can be demonstrated that efforts have been made to secure their continued use and alternatives are provided. Cambridgeshire County Council objects to Policy GAM6 under basic Condition A as the policy is not considered clear and unambiguous as required under Paragraph 16(d) of the NPPF and Paragraph 041 (Ref. 41-041-20140306) of the NPPG. The policy does not define what falls within “amenities and facilities” for the purpose of the policy, or what an applicant is expected to demonstrate to show that “efforts have been made to secure their continued use”. Furthermore, it has not taken into account the existing level of provision within the settlement. In line with the Local Plan, it is suggested that the wording be updated to “village services and facilities, including village pubs, shops, post offices, banks and building societies, community buildings and meeting places, sports venues, cultural buildings, places of worship or health facilities, where such loss would cause an unacceptable reduction in the level of community or service provision in the locality”. This change in wording is also required to meet basic condition E (see below).

Policy GAM6 also does not meet basic condition E which requires general conformity with the strategic policies contained in the development plan. This includes Local Plan Policy SC/3: Protection of Village Services and Facilities which seeks to protect village services and facilities. However, as set out above, Policy GAM6 does not include the same definition of facilities and services as Policy SC/3. Furthermore, Policy SC/3 sets out clear guidance on what will be considered in determining the significance of the loss of a village service or facility:

- a) *“The established use of the premises and its existing and potential contribution to the social amenity of the local population;*
- b) *The presence of other village services and facilities which provide an alternative, with convenient access by good local public transport services, or by cycling or*

- walking; and how these remaining uses will cope with displaced users; and any unacceptable impact of those alternative services or facilities;*
- c) The future economic viability of the use including the results of marketing of the premises for a minimum of 12 months at a realistic price and in appropriate cases financial information.”*

Neighbourhood Plan Policy GAM6 does not provide this clarity which is considered important for the application of the policy. Policy GAM6, therefore, does not conform with Policy SC/3 of the Local Plan.

GAM7 – DESIGNATION OF THE FORMER FIRST SCHOOL FIELD, GREEN END AS A LOCAL GREEN SPACE (TL 23582 52417) AND NEIGHBOURHOOD PLAN MAPS OBJECT

Policy GAM7

Policy GAM7 designates the former First School Field as Local Green Space with pedestrian access. Cambridgeshire County Council objects to Policy GAM7 under basic Condition A as the policy is not realistic or deliverable. Paragraph 16(b) of the NPPF states that plans should “be prepared positively, in a way that is aspirational but deliverable”. This is repeated in Paragraph 005 (Ref. 41-005-20190509) of the NPPG which specifically covers neighbourhood plans. Paragraph 002 (Ref. 10-002-20190509) of the NPPG also states that “it is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies”.

The former First School Field is private land with no public access (including no public rights of way across the land). Access is only granted through private agreements with Cambridgeshire County Council. Cambridgeshire County Council, as landowner, clearly stated within their Regulation 14 consultation response that “access to the playfields will be granted, on permission only basis, to documented authorised users”. A Local Green Space designation does not confer any rights of public access over what exists at present (NPPG, Paragraph 017, Ref. 37-017-20140306).

Therefore, there is no public access and the inclusion of “with pedestrian access” is neither realistic nor deliverable. Consequently, Policy GAM7 is not appropriate and does not meet basic Condition A.

Cambridgeshire County Council also object to the boundary of the proposed Local Green Space designation which includes the Scouts Hut and car park. Having regard to national policies and advice contained in guidance, the inclusion of the Scouts Hut and car parking within the proposed Local Green Space designation is considered inappropriate and does not meet basic Condition A.

The purpose of Local Green Space designations is to provide special protection for green areas of particular importance to local communities (NPPF, Paragraph 101; NPPG, Paragraph 005, Ref. 37-005-20140306). It is not considered that the Scouts Hut or associated car park fall within the definition of “green areas” to which Local Green Spaces designations apply.

While the definition of green areas includes “land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis” NPPG, (Paragraph 013, Ref. 37-013-20140306), the Scouts Hut and car park comprise built development that does not read as part of the former First School Field green area. Rather, the Scouts Hut and car park form part of the built-up area including the former school. Therefore, they are considered to fall beyond the definition of a green area. Assets such as the Scouts Hut are covered under different areas of protection including through the existing Asset of Community Value (ACV) listing.

Neighbourhood Plan Maps

The following maps show the boundary to the proposed Local Green Space designation which includes the Scouts Hut and car park. This includes:

- Map 4: Landscape Setting
- Map 7: Key Policy Areas 1-12
- Map 9: Community Amenities and Facilities
- Map 10: Walking Cycling and Horse-Riding Routes
- Map 11: Gamlingay Wood – GAM12

As set out above, having regard to national policies and advice contained in guidance, the inclusion of the Scouts Hun and car parking within the proposed Local Green Space designation is considered inappropriate and does not meet basic Condition A.

GAM8 – REUSE OF THE FORMER FIRST SCHOOL BUILDINGS, GREEN END (TL 23647 52413)

OBJECT

Policy GAM8 proposes the reuse of the former First School buildings and new buildings for educational and community uses (e.g Use Classes a, b, e, f, g). Cambridgeshire County Council objects to Policy GAM8 under basic conditions A, D and E.

Condition A: Regard to national policies and advice

Policy GAM8 proposes educational and community uses (including Use Classes a, b, e, f, g) on the site. It is assumed the policy refers to Use Class **E** (a, b, e, f, g)) and, if so, this should be updated accordingly. Use Class E (a, b, e, f, g) includes:

- E(a) Display or retail sale of goods, other than hot food
- E(b) Sale of food and drink for consumption (mostly) on the premises
- E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
- E(f) Creche, day nursery or day centre (not including a residential use)
- E(g) Uses which can be carried out in a residential area without detriment to its amenity:
 - E(g)(i) Offices to carry out any operational or administrative functions,
 - E(g)(ii) Research and development of products or processes
 - E(g)(iii) Industrial processes

The use classes above are not consistent with the “educational or community uses” as stated in the policy. The list of use classes includes other uses such as retail and employment and excludes Use Class F (local community and learning). Paragraph 16(d) of the NPPF and Paragraph 041 (Ref. 41-041-20140306) of the NPPG require that policies be clear and unambiguous, so that it is obvious how the decision maker should apply the policy when determining planning applications and so that policy is applied consistently. However, the current wording of Policy GAM8 is neither clear nor unambiguous in respect of what uses would be supported on the site.

Policy GAM8 also states that the former First School buildings and new buildings on the brownfield site should be safeguarded for ten years. However, there is no reference to, or justification of, the ten-year period within the supporting text. Paragraph 31 of the NPPF also requires the preparation and review of all policies to be underpinned by relevant and

up-to-date evidence. It advises that this should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned and should take into account relevant market signals. Furthermore, specific to neighbourhood planning, Paragraph 041 (Ref. 41-041-20140306) of the NPPG advises that policies should be supported by appropriate evidence and Paragraph 040 (Rev. 41-040-20160211) states that “proportionate, robust evidence should support the choices made and the approach taken” and that the evidence should be “drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan”.

The ten-year safeguarding period set out in Policy GAM8 has not been supported by robust evidence nor considered relevant market signals. Furthermore, the intention or rationale behind the set period has not been explained. It does not appear as though any viability work has been carried out, and the possibility of the Grade II listed building remaining unoccupied for a period of ten years if a compatible and viable scheme cannot be found does not appear to have been considered. The prospect of the site remaining unoccupied for ten years will not be of benefit to the Cambridgeshire County Council (landowner), the local community, or the preservation of the heritage asset.

Policy GAM8 also restricts the development options available for the former First School without first considering the viability of the options specified. Paragraph 190 of the NPPF states that plans should “set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats”. The strategy should take into account (amongst other things) “the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation”.

As set out above, the former First School is Grade II listed and it does not appear as though any work has been carried out on the viability of the development options specified in Policy GAM8. Cambridgeshire County Council, as landowner, are investigating a whole site solution for the redevelopment / disposal of the site. While investigations into alternative uses are still ongoing, it is envisaged that a mixed-use scheme would be the best solution for the site which may include some uses not specified in Policy GAM8. In its current wording, Policy GAM8 does not allow sufficient flexibility for the best whole site solution to be developed. It is not in the interest of Cambridgeshire County Council, the local community, or the preservation of the heritage asset for the site to remain unoccupied for a period of ten years if a compatible and viable scheme cannot be found.

All capital raised from the disposal of the site will also be reinvested into front line services across the county.

Therefore, having regard to national policies and advice contained in guidance, Policy GAM8 is not appropriate and does not meet basic condition A because:

1. The wording of the policy is neither clear nor unambiguous
2. The safeguarding of the site for ten years has not been supported by robust evidence nor taken into account relevant market signals
3. The restriction of potential uses on the site does not provide a positive strategy for the conservation and enjoyment of the historic environment

Condition D: Sustainability

Policy GAM8 restricts possible uses on the site with insufficient flexibility and “safeguards” the former First School buildings and new buildings for a period of ten-years. However, “safeguarding” the former First School buildings and new buildings for this period does not meet the requirement for sustainable development. The former First School is Grade II listed (listing reference 1271139) and it does not appear as though any work has been carried out on viability. The layout and configuration of the building(s) are unlikely to make for an easy conversion. The possibility of the listed asset remaining unoccupied for a period of ten years if a compatible and viable scheme cannot be found does not contribute to the achievement of sustainable development (NPPF, Paragraph 7), nor meet the sustainability objectives (economic, social, or environmental) which should be delivered through the preparation and implementation of plans and the application of the policies in the NPPF (NPPF, Paragraphs 8 and 9). While unoccupied the asset would sit as an unutilised resource; it would not generate any income, it would not benefit the local community, and the upkeep of the heritage asset would be affected.

Condition E: General conformity with the strategic policies contained in the development plan

Condition E requires general conformity with the strategic policies contained in the development plan. Appendix E of the Local Plan identifies the “Strategic Policies” in the South Cambridgeshire Local Plan. Those considered particularly relevant in this case are:

- NH/14: Heritage Assets
- NH/15: Heritage Assets and Adapting to Climate Change

- SC/3: Protection of Village Services and Facilities

Policy NH/14 supports the retention and enhancement of the heritage assets and NH/15 encourages and supports the re-use of historic buildings as a sustainable resource. However, as set out above, the restriction of possible uses and the ten year safeguarding period set out in Policy GAM8 mean the Grade II listed former First School may remain unoccupied for a period of ten years if a compatible and viable scheme cannot be found. This does not conform with strategic policies NH/14 or NH/15. Greater flexibility is therefore required in respect of the potential use of the heritage asset.

Policy SC/3: Protection of Village Services and Facilities seeks to protect villages services and facilities including community buildings such as the former First School. However, Policy SC/3 also recognises the need for flexibility stating that the following matters will be considered in determining the significance of the loss of a village service or facility:

- d) *“The established use of the premises and its existing and potential contribution to the social amenity of the local population;*
- e) *The presence of other village services and facilities which provide an alternative, with convenient access by good local public transport services, or by cycling or walking; and how these remaining uses will cope with displaced users; and any unacceptable impact of those alternative services or facilities;*
- f) *The future economic viability of the use including the results of marketing of the premises for a minimum of 12 months at a realistic price and in appropriate cases financial information.”*

By not including similar measures to allow flexibility, Policy GAM8 conflicts with Policy SC/3 of the Local Plan. The need for flexibility is even more apparent in this case owing to the existing configuration of the building, its age, and its listed status, which mean that a significant amount of investment in the building is likely to be required. No justification or rationale for the non-conformity with Policy SC/3 has been provided within the Neighbourhood Plan. Furthermore, as set out above, no evidence has been provided to justify the “safeguarding” period which has the potential to see the valuable heritage asset and existing resource remain unoccupied for a significant period if a viable scheme cannot be found.

GAM10 – CONTRIBUTIONS TOWARDS PROVIDING NEW INFRASTRUCTURE FOR WALKING, CYCLING AND HORSE RIDING AND APPENDIX 3: DEVELOPER CONTRIBUTIONS

OBJECT

Policy GAM10 requires new residential and business units to contribute towards the provision and maintenance of new paths for the purpose of cycling, walking and horse riding between the village, hamlets, employment sites and neighbouring villages. It sets out the level of contribution required. Appendix 3 sets out further information on developer contributions.

Cambridgeshire County Council objects to Policy GAM10 as it is not considered to meet basic Condition A. Paragraph 005 (Reference ID: 41-005-20190509) and Paragraph 001 (Reference ID: 10-001-20190509) of the NPPG advise respectively that:

“Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy.”

“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106...”

Insufficient evidence has been provided on how the proposed contributions relate to the strategic policies within the Local Plan or how they will impact the deliverability of the neighbourhood plan, local plan, or spatial development strategy. Furthermore, a proportionate assessment of viability has not been provided. The lack of evidence also conflicts with Paragraph 31 of the NPPF and Paragraph 041 (Ref. 41-041-20140306) of the NPPG.

The policy is also ambiguous as the term “business developments” has not been defined so it is not clear what it is intended to include. Paragraph 16(d) of the NPPF and

Paragraph 041 (Ref. 41-041-20140306) of the NPPG require policies be clear and unambiguous, so that it is obvious how the decision maker should apply them.

It should be noted that the former First School Playing Field was not identified as recreation space within the Council's Recreation and Open Space Study (July 2013) nor within the Services and Facilities Study (March 2014).

GAM11 – LANDSCAPE AND NATURAL ENVIRONMENT

OBJECT

Policy GAM11 advises that green spaces within developments should be consolidated to create a network of publicly accessible formal and informal green spaces – green infrastructures – for sport and recreation. Cambridgeshire County Council objects to Policy GAM11 on the grounds that it is not deliverable (as required under Paragraph 16(b) of the NPPF) as not all green space within developments will necessarily be publicly accessible. Therefore, in its current wording the policy does not meet basic condition A.

It is suggested that the words “public open” be inserted at the start of the sentence so that it reads:

“Public open green space within developments should be consolidated to create a network of publicly accessible formal and informal green spaces – green infrastructures – for sport and recreation.”

APPENDIX 2: GAMLINGAY'S GREEN INFRASTRUCTURE

COMMENTS

Appendix 2 identifies sites of sport, recreation and amenity value where residents can come together both informally and where community events are held. The Gamlingay First School playing fields, Green End (0.8 ha) (Asset of Community Value-ACV) is included within the list.

The former First School Playing Field is private land with no public access (including no public rights of way across the land). Access is only granted through private agreements with Cambridgeshire County Council. While the land was previously used for sports and recreation associated with the school use, the school use has now ceased owing to the relocation of the school.

GENERAL

COMMENTS

Reference to the NPPF needs to be updated to the 2021 version.

The conservation area boundary does not exactly follow that drawn on the Local Plan Policy Map for Gamlingay.

Summary of Comments:

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

Cambridgeshire County Council, as landowners of the former First School and Playing Fields, supports / objects / comments on the following policies and paragraphs in the Gamlingay Neighbourhood Plan as they do not meet all of the basic conditions set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

A bullet point summary of the main issues raised is provided below:

- **Objective 1 – Supports:**

- The objective recognises the need for appropriate housing growth in Gamlingay including then need for smaller and adaptable home. This is supported.

- **Objective 4 – Objects:**

- Objects under basic conditions A, D and E:
 - The objective acknowledges Policies GAM7 and GAM8. Cambridgeshire County Council objects to these policies under basic conditions A, D and E (see representations submitted in respect of the said policies below); the objection also applies to Objective 4.

- **Paragraphs 4.12 and 4.13 – Supports**

- Paragraph 4.12 indicates a particular demand for smaller 1-2-bedroom homes and bungalows in Gamlingay and Paragraph 4.13 recommends developers focus on less expensive, smaller, and adaptable 2 to 3-bedroom houses and bungalows. Cambridgeshire County Council supports the provision of smaller homes which could be explored as part of a mixed-use scheme at the former First School site.

- **Paragraph 4.60 – Objects**

- Objects under basic condition A, D and E:
 - Paragraph 4.60 refers to Policy GAM8. Cambridgeshire County Council objects to Policy GAM8 under basic conditions A, D and E (see

representations submitted in respect of the said policies below); the objection also applies to Paragraph 4.60. To produce an effective whole site solution for the former First School buildings it is highly likely that a mixed use scheme will be required. Thus, greater flexibility on the potential future uses is required to ensure a suitable viable scheme can be developed.

- **Paragraph 4.62 – Comments**

- It should be noted that the former First School field is private land with no public access. Access to the former First School field is only granted through private agreements with Cambridgeshire County Council.

- **Policy GAM6 – Objects:**

- Objects under basic condition A:
 - The policy does not define what falls within “amenities and facilities” for the purpose of the policy, or what an applicant is expected to demonstrate to show that “efforts have been made to secure their continued use”. The policy is therefore unclear and ambiguous. It is recommended that the wording be updated to “village services and facilities” in line with the Local Plan to provide more clarity.
- Objects under basic condition E:
 - Policy SC/3 sets out clear guidance on what will be considered in determining the significance of the loss of a village service or facility. Policy GAM6 does not provide a similar level of clarity.

- **Policy GAM7 and Neighbourhood Plan Maps (4, 7, 9, 10 and 11) – Objects:**

- Objects under basic condition A:
 - The policy is not realistic or deliverable as the former First School Field is private land with no public access. It is recommended that the inclusion of “with pedestrian access” be removed from the policy.
 - The Scouts Hut and car park do not fall within the definition of “green areas” to which Local Green Space designations apply. It is recommended that the Scouts Hut and car park be removed from the proposed designation.

- **Policy GAM8 – Objects:**

- Objects under basic condition A:
 - The policy is unclear and ambiguous as the use classes set out are not consistent with the description of “educational or community uses” stated in the policy.

- The safeguarding period of ten years has not been adequately supported by robust up-to-date evidence nor have relevant market signals been considered. Furthermore, the intention or rationale behind the set period has not been explained. It does not appear as though any viability work has been carried, and the possibility of the Grade II listed building remaining unoccupied if a compatible and viable scheme cannot be found does not appear to have been considered.
 - The policy does not set a positive strategy for the conservation and enjoyment of the historic environment which includes putting heritage assets to a viable use consistent with their conservation. The policy restricts the development options available on the site without first having considered the viability of the options specified.
 - Objects under basic condition D:
 - The possibility of the listed asset remaining unoccupied for a period of ten years (the “safeguarding” period) if a compatible and viable scheme cannot be found does not contribute to the achievement of sustainable development. It does not appear as though any work has been carried out on viability and the layout and configuration of the building(s), together with the listed status, are unlikely to make for an easy conversion.
 - Objects under basic condition E:
 - NH/14: Heritage Assets and NH/15: Heritage Assets and Adapting to Climate Change - the restriction of the possible uses and the ten year safeguarding period mean the Grade II listed former First School may remain unoccupied for ten years if a compatible and viable scheme cannot be found. This does not conform with strategic policies NH/14 or NH/15. Greater flexibility is therefore required in respect of the potential use of the heritage asset.
 - SC/3: Protection of Village Services and Facilities - while seeking to protect villages services and facilities, Policy SC/3 also recognises the need for flexibility. By not including similar measures to allow flexibility, Policy GAM8 conflicts with Policy SC/3 of the Local Plan. The need for flexibility is even more apparent in this case owing to the existing configuration of the building, its age, and its listed status. No justification or rationale for the non-conformity with Policy SC/3 or for the safeguarding period has been provided.

- **Policy GAM10 and Appendix 3 – Objects**

- Objects under condition A:
 - Insufficient evidence has been provided on how the proposed contributions relate to the strategic policies within the Local Plan or how they will impact the deliverability of the neighbourhood plan, local plan, or spatial development strategy. Furthermore, a proportionate assessment of viability has not been provided.
 - “Business developments” has not been defined so it is not clear what it is intended to include, therefore, the policy is unclear and ambiguous.

- **Policy GAM11 – Objects:**

- Objects under condition A:
 - The policy is not deliverable because not all green space within developments will necessarily be publicly accessible. It is recommended that the words “public open” be inserted at the start of the policy.

- **Appendix 2 – Comments**

- The former First School Playing Field is private land with no public access, access is only granted through private agreements with Cambridgeshire County Council.

- **General – Comments**

- Reference to the NPPF should be updated to the 2021 version
- The conservation area boundary should be updated to follow that drawn on the Local Plan Policy Map for Gamlingay.

Completed forms must be received by 5pm on 23 November 2021 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
Cambourne Business Park, Cambourne,
Cambridge, CB23 6EA

56543

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Cambridgeshire County Council

Agent: Carter Jonas

Date received: 19/11/2021 via Email

Summary:

GAM7 – DESIGNATION OF THE FORMER FIRST SCHOOL FIELD, GREEN END AS A LOCAL GREEN SPACE (TL 23582 52417) AND NEIGHBOURHOOD PLAN MAPS

Policy GAM7

Policy GAM7 designates the former First School Field as Local Green Space with pedestrian access. Cambridgeshire County Council objects to Policy GAM7 under basic Condition A as the policy is not realistic or deliverable. Paragraph 16(b) of the NPPF states that plans should “be prepared positively, in a way that is aspirational but deliverable”. This is repeated in Paragraph 005 (Ref. 41-005-20190509) of the NPPG which specifically covers neighbourhood plans. Paragraph 002 (Ref. 10-002-20190509) of the NPPG also states that “it is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies”.

The former First School Field is private land with no public access (including no public rights of way across the land). Access is only granted through private agreements with Cambridgeshire County Council. Cambridgeshire County Council, as landowner, clearly

stated within their Regulation 14 consultation response that “access to the play fields will be granted, on permission only basis, to documented authorised users”. A Local Green Space designation does not confer any rights of public access over what exists at present

(NPPG, Paragraph 017, Ref. 37-017-20140306).

Therefore, there is no public access and the inclusion of “with pedestrian access” is neither realistic nor deliverable. Consequently, Policy GAM7 is not appropriate and does not meet basic Condition A.

Cambridgeshire County Council also object to the boundary of the proposed Local Green Space designation which includes the Scouts Hut and car park. Having regard to national policies and advice contained in guidance, the inclusion of the Scouts Hut and car parking within the proposed Local Green Space designation is considered inappropriate and does not meet basic Condition A.

The purpose of Local Green Space designations is to provide special protection for green areas of particular importance to local communities (NPPF, Paragraph 101; NPPG, Paragraph 005, Ref. 37-005-20140306). It is not considered that the Scouts Hut or associated car park fall within the definition of “green areas” to which Local Green Spaces designations apply.

While the definition of green areas includes “land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis” NPPG, (Paragraph 013, Ref. 37-013-20140306), the Scouts Hut and car park comprise built development that does not read as part of the former First School Field green area. Rather, the Scouts Hut and car park form part of the built-up area including the former school. Therefore, they are considered to fall beyond the definition of a green area. Assets such as the Scouts Hut are covered under different areas of protection including through the existing Asset of Community Value (ACV) listing.

Neighbourhood Plan Maps

The following maps show the boundary to the proposed Local Green Space designation which includes the Scouts Hut and car park. This includes:

- ☒ Map 4: Landscape Setting
- ☒ Map 7: Key Policy Areas 1-12
- ☒ Map 9: Community Amenities and Facilities
- ☒ Map 10: Walking Cycling and Horse-Riding Routes
- ☒ Map 11: Gamlingay Wood – GAM12

As set out above, having regard to national policies and advice contained in guidance, the inclusion of the Scouts Hun and car parking within the proposed Local Green Space designation is considered inappropriate and does not meet basic Condition A.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s4>

56544

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Cambridgeshire County Council

Agent: Carter Jonas

Date received: 19/11/2021 via Email

Summary:

GAM8 – REUSE OF THE FORMER FIRST SCHOOL BUILDINGS, GREEN END (TL
23647 52413)

Policy GAM8 proposes the reuse of the former First School buildings and new buildings for educational and community uses (e.g Use Classes a, b, e, f, g). Cambridgeshire County Council objects to Policy GAM8 under basic conditions A, D and E.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s4>

56545

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** Cambridgeshire County Council**Agent:** Carter Jonas**Date received:** 19/11/2021 via Email**Summary:**

Policy GAM10 requires new residential and business units to contribute towards the provision and maintenance of new paths for the purpose of cycling, walking and horse riding between the village, hamlets, employment sites and neighbouring villages. It sets out the level of contribution required. Appendix 3 sets out further information on developer contributions.

Cambridgeshire County Council objects to Policy GAM10 as it is not considered to meet basic Condition A. Paragraph 005 (Reference ID: 41-005-20190509) and Paragraph 001 (Reference ID: 10-001-20190509) of the NPPG advise respectively that: "Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy."

"Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106..."

Insufficient evidence has been provided on how the proposed contributions relate to the strategic policies within the Local Plan or how they will impact the deliverability of the neighbourhood plan, local plan, or spatial development strategy. Furthermore, a proportionate assessment of viability has not been provided. The lack of evidence also conflicts with Paragraph 31 of the NPPF and Paragraph 041 (Ref. 41-041-20140306) of the NPPG.

The policy is also ambiguous as the term "business developments" has not been defined so it is not clear what it is intended to include. Paragraph 16(d) of the NPPF and Paragraph 041 (Ref. 41-041-20140306) of the NPPG require policies be clear and unambiguous, so that it is obvious how the decision maker should apply them.

It should be noted that the former First School Playing Field was not identified as recreation space within the Council's Recreation and Open Space Study (July 2013) nor within the Services and Facilities Study (March 2014).

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s4>

56546

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** Cambridgeshire County Council**Agent:** Carter Jonas**Date received:** 19/11/2021 via Email**Summary:**

GAM11 – LANDSCAPE AND NATURAL ENVIRONMENT

Policy GAM11 advises that green spaces within developments should be consolidated to create a network of publicly accessible formal and informal green spaces – green infrastructures – for sport and recreation. Cambridgeshire County Council objects to Policy

GAM11 on the grounds that it is not deliverable (as required under Paragraph 16(b) of the NPPF) as not all green space within developments will necessarily be publicly accessible. Therefore, in its current wording the policy does not meet basic condition A.

It is suggested that the words “public open” be inserted at the start of the sentence so that it reads:

“Public open green space within developments should be consolidated to create a network of publicly accessible formal and informal green spaces – green infrastructures – for sport and recreation.”

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s4>

56547

Support

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Cambridgeshire County Council

Agent: Carter Jonas

Date received: 19/11/2021 via Email

Summary:

APPENDIX 2: GAMLINGAY'S GREEN INFRASTRUCTURE

COMMENTS

Appendix 2 identifies sites of sport, recreation and amenity value where residents can come together both informally and where community events are held. The Gamlingay First School playing fields, Green End (0.8 ha) (Asset of Community Value-ACV) is included within the list.

The former First School Playing Field is private land with no public access (including no public rights of way across the land). Access is only granted through private agreements with Cambridgeshire County Council. While the land was previously used for sports and recreation associated with the school use, the school use has now ceased owing to the relocation of the school.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s4>

56548

Support

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Cambridgeshire County Council

Agent: Carter Jonas

Date received: 19/11/2021 via Email

Summary:

GENERAL

COMMENTS

Reference to the NPPF needs to be updated to the 2021 version.

The conservation area boundary does not exactly follow that drawn on the Local Plan Policy Map for Gamlingay.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s4>

Gamlingay Neighbourhood Plan



Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or

neighbourhood.planning@greatercambridgeplanning.org

All comments **must** be received by 5pm on Tuesday 23 November 2021.

Data Protection

We will treat your data in accordance with our Privacy Notices:

www.scams.gov.uk/planning-policy-privacy-notice/. Information will be used by South Cambridgeshire District Council solely in relation to the Gamlingay Neighbourhood Plan.

Please note that all responses will be available for public inspection and cannot be treated as confidential. Representations, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed of future stages of the Gamlingay Neighbourhood Plan?

Please tick: Yes No

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:	N/A	Agent's name:	██████████
Name of organisation: (if applicable)	Cambridgeshire County Council	Name of Agent's organisation: (if applicable)	Carter Jonas LLP
Address:	Box OCT 1228 Shire Hall Castle Hill Cambridge	Agent's Address:	One Station Square, Cambridge
Postcode:	CB3 0AP	Postcode:	CB1 2GA
Email:	c/o Agent	Email:	██
Telephone:	c/o Agent	Telephone:	██████████
Signature:		Date:	19 November 2021

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representation number:

Part B – Your Response

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

Policy or Paragraph Number (please state)	Objective 1, Objective 4, Paragraphs 4.12 and 4.13, Paragraph 4.60, Paragraph 4.62, Policy GAM6, Policy GAM7 and Neighbourhood Plan Maps (4, 7, 9, 10 and 11), Policy GAM8, Policy GAM10 and Appendix 3, Policy GAM11, Appendix 2, General.
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.

INTRODUCTION

Cambridgeshire County Council, as landowners of the former First School and Playing Fields, supports / objects / comments on the following policies and paragraphs in the Gamlingay Neighbourhood Plan:

- Objective 1 – Supports
- Objective 4 – Objects
- Paragraphs 4.12 and 4.13 – Supports
- Paragraph 4.60 – Objects
- Paragraph 4.62 – Comments
- Policy GAM6 – Objects
- Policy GAM7 and Neighbourhood Plan Maps (4, 7, 9, 10 and 11) – Objects

- Policy GAM8 – Objects
- Policy GAM10 and Appendix 3 – Objects
- Policy GAM11 – Objects
- Appendix 2 – Comments
- General – Comments

Representations made in respect of the above are set out below. Representations made at this stage are limited to whether or not the Neighbourhood Plan meets the basic conditions and other matters that the independent examiner is required to consider under Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) which is applied to neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act 2004. Representations may also address whether the referendum area should be extended beyond the neighbourhood area, and a case can be made for an oral hearing.

It is concluded that the Neighbourhood Plan does not meet basic conditions A, D and E:

- Condition A - having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order [or neighbourhood plan]
- Condition D - the making of the order [or neighbourhood plan] contributes to the achievement of sustainable development
- Condition E - the making of the order [or neighbourhood plan] is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

Therefore, that it should not proceed to referendum or be made without modification.

It is also requested that the examination include a public hearing, under Paragraph 9 of Schedule 4B to the Town and Country Planning Act 1990, to ensure Cambridgeshire County Council has a fair chance to put their case forward. It is important that the points set out in the representations below receive full consideration and that Local Plan is modified appropriately to address the concerns raised.

FORMER FIRST SCHOOL AND PLAYING FIELDS

Cambridgeshire County Council (CCC) are in the process of looking for a whole site solution for the former First School. Their priority is to secure a long-term, viable use. A detailed feasibility study of the site has not yet been carried out, but based on experience in the area, it is considered likely that a residential-led, mixed use proposal would provide the value needed to retain and convert existing buildings. The size and configuration of the buildings would appear to lend themselves well to conversion into smaller homes, and there may be an opportunity to use part of the site for community use, as part of a comprehensive scheme.

Whilst we understand the good intentions of the Neighbourhood Plan in respect of proposing the former First School buildings for education and community uses, the concern that CCC has, as landowner, is whether there is demand / committed interest for such uses, and whether such demand is viable in the long-term. No evidence from the Neighbourhood Plan process has been identified to support full use of the site for community purposes.

The policy priority for this site should be to ensure buildings are protected and re-used for an appropriate use (or mix of uses), and whilst this might start by encouraging community re-use as a policy preference, there should be flexibility within the wording to support alternative uses if a community use cannot be secured.

REPRESENTATIONS

OBJECTIVE 1: HOUSING GROWTH

SUPPORT

Objective 1 recognises the need for appropriate housing growth in Gamlingay including the need for smaller and adaptable homes. This is supported.

OBJECTIVE 4: COMMUNITY AMENITIES AND FACILITIES

OBJECT

The supporting text to Objective 4 advises that Policy GAM7 designates the former First School Playing Field as new Local Green Space with pedestrian access. It also advises that Policy GAM8 supports development of the former First School buildings for educational and community uses and safeguards the site for 10 years. Cambridgeshire County Council objects to Policies GAM7 and GAM8 under basic conditions A, D and E,

see representations submitted in respect of Policies GAM7 and GAM8 below. Thus, Cambridgeshire County Council also objects to the supporting text to Objective 4 under the same basic conditions.

PARAGRAPHS 4.12 and 4.13

SUPPORT

Paragraph 4.12 advises that the Bedfordshire Rural Communities Charity (BRCC) Housing Needs Survey Report (2018) indicates a particular demand for smaller 1-2-bedroom homes and bungalows in Gamlingay to meet the needs of single people requiring accommodation on their own, as well as older people seeking to downsize. Paragraph 4.13 recommends developers focus on less expensive, smaller, and adaptable 2 to 3-bedroom houses and bungalows. Cambridgeshire County Council supports the provision of smaller homes which could be explored as part of a mixed-use scheme at the former First School site.

PARAGRAPH 4.60

OBJECT

Paragraph 4.60 advises that there is a shortfall of places for care of children during their early years in Gamlingay. It goes on to state that the existing former First School buildings would provide an ideal location for pre-school care. Policy GAM8 is proposing the reuse of the buildings on the former First School site for educational and community purposes where a need (e.g. for pre-school provision, a new doctors' surgery or relocation of the Co-op) can be met.

Cambridgeshire County Council objects to Paragraph 4.60 under basic conditions A, D and E (see representations submitted in respect of Policy GAM8). Cambridgeshire County Council acknowledges its duty to provide pre-school places. However, while a detailed feasibility study of the site has not yet been carried out, based on experience in the area it is considered likely that a sole pre-school use would not be viable. Also, due to the size of the buildings multiple site occupants would be required. To produce an effective whole site solution, it is highly likely that a mixed use scheme will be required to support such facilities, however, this should not be restricted to education and community uses. Rather, greater flexibility should be provided to ensure a suitable viable scheme can be developed. This view was expressed by Cambridgeshire County Council as part of the Regulation 14 Consultation.

PARAGRAPH 4.62

COMMENT

The former First School field is private land with no public access. Access to the former First School field is only granted through private agreements with Cambridgeshire County Council.

GAM6 – COMMUNITY AMENITIES AND FACILITIES

OBJECT

Policy GAM6 states that the loss of amenities and facilities will be resisted unless it can be demonstrated that efforts have been made to secure their continued use and alternatives are provided. Cambridgeshire County Council objects to Policy GAM6 under basic Condition A as the policy is not considered clear and unambiguous as required under Paragraph 16(d) of the NPPF and Paragraph 041 (Ref. 41-041-20140306) of the NPPG. The policy does not define what falls within “amenities and facilities” for the purpose of the policy, or what an applicant is expected to demonstrate to show that “efforts have been made to secure their continued use”. Furthermore, it has not taken into account the existing level of provision within the settlement. In line with the Local Plan, it is suggested that the wording be updated to “village services and facilities, including village pubs, shops, post offices, banks and building societies, community buildings and meeting places, sports venues, cultural buildings, places of worship or health facilities, where such loss would cause an unacceptable reduction in the level of community or service provision in the locality”. This change in wording is also required to meet basic condition E (see below).

Policy GAM6 also does not meet basic condition E which requires general conformity with the strategic policies contained in the development plan. This includes Local Plan Policy SC/3: Protection of Village Services and Facilities which seeks to protect village services and facilities. However, as set out above, Policy GAM6 does not include the same definition of facilities and services as Policy SC/3. Furthermore, Policy SC/3 sets out clear guidance on what will be considered in determining the significance of the loss of a village service or facility:

- a) *“The established use of the premises and its existing and potential contribution to the social amenity of the local population;*
- b) *The presence of other village services and facilities which provide an alternative, with convenient access by good local public transport services, or by cycling or*

- walking; and how these remaining uses will cope with displaced users; and any unacceptable impact of those alternative services or facilities;*
- c) The future economic viability of the use including the results of marketing of the premises for a minimum of 12 months at a realistic price and in appropriate cases financial information.”*

Neighbourhood Plan Policy GAM6 does not provide this clarity which is considered important for the application of the policy. Policy GAM6, therefore, does not conform with Policy SC/3 of the Local Plan.

GAM7 – DESIGNATION OF THE FORMER FIRST SCHOOL FIELD, GREEN END AS A LOCAL GREEN SPACE (TL 23582 52417) AND NEIGHBOURHOOD PLAN MAPS OBJECT

Policy GAM7

Policy GAM7 designates the former First School Field as Local Green Space with pedestrian access. Cambridgeshire County Council objects to Policy GAM7 under basic Condition A as the policy is not realistic or deliverable. Paragraph 16(b) of the NPPF states that plans should “be prepared positively, in a way that is aspirational but deliverable”. This is repeated in Paragraph 005 (Ref. 41-005-20190509) of the NPPG which specifically covers neighbourhood plans. Paragraph 002 (Ref. 10-002-20190509) of the NPPG also states that “it is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies”.

The former First School Field is private land with no public access (including no public rights of way across the land). Access is only granted through private agreements with Cambridgeshire County Council. Cambridgeshire County Council, as landowner, clearly stated within their Regulation 14 consultation response that “access to the playfields will be granted, on permission only basis, to documented authorised users”. A Local Green Space designation does not confer any rights of public access over what exists at present (NPPG, Paragraph 017, Ref. 37-017-20140306).

Therefore, there is no public access and the inclusion of “with pedestrian access” is neither realistic nor deliverable. Consequently, Policy GAM7 is not appropriate and does not meet basic Condition A.

Cambridgeshire County Council also object to the boundary of the proposed Local Green Space designation which includes the Scouts Hut and car park. Having regard to national policies and advice contained in guidance, the inclusion of the Scouts Hut and car parking within the proposed Local Green Space designation is considered inappropriate and does not meet basic Condition A.

The purpose of Local Green Space designations is to provide special protection for green areas of particular importance to local communities (NPPF, Paragraph 101; NPPG, Paragraph 005, Ref. 37-005-20140306). It is not considered that the Scouts Hut or associated car park fall within the definition of “green areas” to which Local Green Spaces designations apply.

While the definition of green areas includes “land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis” NPPG, (Paragraph 013, Ref. 37-013-20140306), the Scouts Hut and car park comprise built development that does not read as part of the former First School Field green area. Rather, the Scouts Hut and car park form part of the built-up area including the former school. Therefore, they are considered to fall beyond the definition of a green area. Assets such as the Scouts Hut are covered under different areas of protection including through the existing Asset of Community Value (ACV) listing.

Neighbourhood Plan Maps

The following maps show the boundary to the proposed Local Green Space designation which includes the Scouts Hut and car park. This includes:

- Map 4: Landscape Setting
- Map 7: Key Policy Areas 1-12
- Map 9: Community Amenities and Facilities
- Map 10: Walking Cycling and Horse-Riding Routes
- Map 11: Gamlingay Wood – GAM12

As set out above, having regard to national policies and advice contained in guidance, the inclusion of the Scouts Hun and car parking within the proposed Local Green Space designation is considered inappropriate and does not meet basic Condition A.

GAM8 – REUSE OF THE FORMER FIRST SCHOOL BUILDINGS, GREEN END (TL 23647 52413)

OBJECT

Policy GAM8 proposes the reuse of the former First School buildings and new buildings for educational and community uses (e.g Use Classes a, b, e, f, g). Cambridgeshire County Council objects to Policy GAM8 under basic conditions A, D and E.

Condition A: Regard to national policies and advice

Policy GAM8 proposes educational and community uses (including Use Classes a, b, e, f, g) on the site. It is assumed the policy refers to Use Class **E** (a, b, e, f, g)) and, if so, this should be updated accordingly. Use Class E (a, b, e, f, g) includes:

- E(a) Display or retail sale of goods, other than hot food
- E(b) Sale of food and drink for consumption (mostly) on the premises
- E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
- E(f) Creche, day nursery or day centre (not including a residential use)
- E(g) Uses which can be carried out in a residential area without detriment to its amenity:
 - E(g)(i) Offices to carry out any operational or administrative functions,
 - E(g)(ii) Research and development of products or processes
 - E(g)(iii) Industrial processes

The use classes above are not consistent with the “educational or community uses” as stated in the policy. The list of use classes includes other uses such as retail and employment and excludes Use Class F (local community and learning). Paragraph 16(d) of the NPPF and Paragraph 041 (Ref. 41-041-20140306) of the NPPG require that policies be clear and unambiguous, so that it is obvious how the decision maker should apply the policy when determining planning applications and so that policy is applied consistently. However, the current wording of Policy GAM8 is neither clear nor unambiguous in respect of what uses would be supported on the site.

Policy GAM8 also states that the former First School buildings and new buildings on the brownfield site should be safeguarded for ten years. However, there is no reference to, or justification of, the ten-year period within the supporting text. Paragraph 31 of the NPPF also requires the preparation and review of all policies to be underpinned by relevant and

up-to-date evidence. It advises that this should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned and should take into account relevant market signals. Furthermore, specific to neighbourhood planning, Paragraph 041 (Ref. 41-041-20140306) of the NPPG advises that policies should be supported by appropriate evidence and Paragraph 040 (Rev. 41-040-20160211) states that “proportionate, robust evidence should support the choices made and the approach taken” and that the evidence should be “drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan”.

The ten-year safeguarding period set out in Policy GAM8 has not been supported by robust evidence nor considered relevant market signals. Furthermore, the intention or rationale behind the set period has not been explained. It does not appear as though any viability work has been carried out, and the possibility of the Grade II listed building remaining unoccupied for a period of ten years if a compatible and viable scheme cannot be found does not appear to have been considered. The prospect of the site remaining unoccupied for ten years will not be of benefit to the Cambridgeshire County Council (landowner), the local community, or the preservation of the heritage asset.

Policy GAM8 also restricts the development options available for the former First School without first considering the viability of the options specified. Paragraph 190 of the NPPF states that plans should “set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats”. The strategy should take into account (amongst other things) “the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation”.

As set out above, the former First School is Grade II listed and it does not appear as though any work has been carried out on the viability of the development options specified in Policy GAM8. Cambridgeshire County Council, as landowner, are investigating a whole site solution for the redevelopment / disposal of the site. While investigations into alternative uses are still ongoing, it is envisaged that a mixed-use scheme would be the best solution for the site which may include some uses not specified in Policy GAM8. In its current wording, Policy GAM8 does not allow sufficient flexibility for the best whole site solution to be developed. It is not in the interest of Cambridgeshire County Council, the local community, or the preservation of the heritage asset for the site to remain unoccupied for a period of ten years if a compatible and viable scheme cannot be found.

All capital raised from the disposal of the site will also be reinvested into front line services across the county.

Therefore, having regard to national policies and advice contained in guidance, Policy GAM8 is not appropriate and does not meet basic condition A because:

1. The wording of the policy is neither clear nor unambiguous
2. The safeguarding of the site for ten years has not been supported by robust evidence nor taken into account relevant market signals
3. The restriction of potential uses on the site does not provide a positive strategy for the conservation and enjoyment of the historic environment

Condition D: Sustainability

Policy GAM8 restricts possible uses on the site with insufficient flexibility and “safeguards” the former First School buildings and new buildings for a period of ten-years. However, “safeguarding” the former First School buildings and new buildings for this period does not meet the requirement for sustainable development. The former First School is Grade II listed (listing reference 1271139) and it does not appear as though any work has been carried out on viability. The layout and configuration of the building(s) are unlikely to make for an easy conversion. The possibility of the listed asset remaining unoccupied for a period of ten years if a compatible and viable scheme cannot be found does not contribute to the achievement of sustainable development (NPPF, Paragraph 7), nor meet the sustainability objectives (economic, social, or environmental) which should be delivered through the preparation and implementation of plans and the application of the policies in the NPPF (NPPF, Paragraphs 8 and 9). While unoccupied the asset would sit as an unutilised resource; it would not generate any income, it would not benefit the local community, and the upkeep of the heritage asset would be affected.

Condition E: General conformity with the strategic policies contained in the development plan

Condition E requires general conformity with the strategic policies contained in the development plan. Appendix E of the Local Plan identifies the “Strategic Policies” in the South Cambridgeshire Local Plan. Those considered particularly relevant in this case are:

- NH/14: Heritage Assets
- NH/15: Heritage Assets and Adapting to Climate Change

- walking; and how these remaining uses will cope with displaced users; and any unacceptable impact of those alternative services or facilities;*
- c) The future economic viability of the use including the results of marketing of the premises for a minimum of 12 months at a realistic price and in appropriate cases financial information.”*

Neighbourhood Plan Policy GAM6 does not provide this clarity which is considered important for the application of the policy. Policy GAM6, therefore, does not conform with Policy SC/3 of the Local Plan.

GAM7 – DESIGNATION OF THE FORMER FIRST SCHOOL FIELD, GREEN END AS A LOCAL GREEN SPACE (TL 23582 52417) AND NEIGHBOURHOOD PLAN MAPS OBJECT

Policy GAM7

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The former First School Field is private land with no public access (including no public rights of way across the land). Access is only granted through private agreements with Cambridgeshire County Council. Cambridgeshire County Council, as landowner, clearly stated within their Regulation 14 consultation response that “access to the playfields will be granted, on permission only basis, to documented authorised users”. A Local Green Space designation does not confer any rights of public access over what exists at present (NPPG, Paragraph 017, Ref. 37-017-20140306).

Therefore, there is no public access and the inclusion of “with pedestrian access” is neither realistic nor deliverable. Consequently, Policy GAM7 is not appropriate and does not meet basic Condition A.

Cambridgeshire County Council also object to the boundary of the proposed Local Green Space designation which includes the Scouts Hut and car park. Having regard to national policies and advice contained in guidance, the inclusion of the Scouts Hut and car parking within the proposed Local Green Space designation is considered inappropriate and does not meet basic Condition A.

The purpose of Local Green Space designations is to provide special protection for green areas of particular importance to local communities (NPPF, Paragraph 101; NPPG, Paragraph 005, Ref. 37-005-20140306). It is not considered that the Scouts Hut or associated car park fall within the definition of “green areas” to which Local Green Spaces designations apply.

While the definition of green areas includes “land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis” NPPG, (Paragraph 013, Ref. 37-013-20140306), the Scouts Hut and car park comprise built development that does not read as part of the former First School Field green area. Rather, the Scouts Hut and car park form part of the built-up area including the former school. Therefore, they are considered to fall beyond the definition of a green area. Assets such as the Scouts Hut are covered under different areas of protection including through the existing Asset of Community Value (ACV) listing.

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As set out above, having regard to national policies and advice contained in guidance, the inclusion of the Scouts Hun and car parking within the proposed Local Green Space designation is considered inappropriate and does not meet basic Condition A.

GAM8 – REUSE OF THE FORMER FIRST SCHOOL BUILDINGS, GREEN END (TL 23647 52413)

OBJECT

Policy GAM8 proposes the reuse of the former First School buildings and new buildings for educational and community uses (e.g Use Classes a, b, e, f, g). Cambridgeshire County Council objects to Policy GAM8 under basic conditions A, D and E.

Condition A: Regard to national policies and advice

Policy GAM8 proposes educational and community uses (including Use Classes a, b, e, f, g) on the site. It is assumed the policy refers to Use Class **E** (a, b, e, f, g)) and, if so, this should be updated accordingly. Use Class E (a, b, e, f, g) includes:

- E(a) Display or retail sale of goods, other than hot food
- E(b) Sale of food and drink for consumption (mostly) on the premises
- E(e) Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)
- E(f) Creche, day nursery or day centre (not including a residential use)
- E(g) Uses which can be carried out in a residential area without detriment to its amenity:
 - E(g)(i) Offices to carry out any operational or administrative functions,
 - E(g)(ii) Research and development of products or processes
 - E(g)(iii) Industrial processes

The use classes above are not consistent with the “educational or community uses” as stated in the policy. The list of use classes includes other uses such as retail and employment and excludes Use Class F (local community and learning). Paragraph 16(d) of the NPPF and Paragraph 041 (Ref. 41-041-20140306) of the NPPG require that policies be clear and unambiguous, so that it is obvious how the decision maker should apply the policy when determining planning applications and so that policy is applied consistently. However, the current wording of Policy GAM8 is neither clear nor unambiguous in respect of what uses would be supported on the site.

Policy GAM8 also states that the former First School buildings and new buildings on the brownfield site should be safeguarded for ten years. However, there is no reference to, or justification of, the ten-year period within the supporting text. Paragraph 31 of the NPPF also requires the preparation and review of all policies to be underpinned by relevant and

up-to-date evidence. It advises that this should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned and should take into account relevant market signals. Furthermore, specific to neighbourhood planning, Paragraph 041 (Ref. 41-041-20140306) of the NPPG advises that policies should be supported by appropriate evidence and Paragraph 040 (Rev. 41-040-20160211) states that “proportionate, robust evidence should support the choices made and the approach taken” and that the evidence should be “drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan”.

The ten-year safeguarding period set out in Policy GAM8 has not been supported by robust evidence nor considered relevant market signals. Furthermore, the intention or rationale behind the set period has not been explained. It does not appear as though any viability work has been carried out, and the possibility of the Grade II listed building remaining unoccupied for a period of ten years if a compatible and viable scheme cannot be found does not appear to have been considered. The prospect of the site remaining unoccupied for ten years will not be of benefit to the Cambridgeshire County Council (landowner), the local community, or the preservation of the heritage asset.

Policy GAM8 also restricts the development options available for the former First School without first considering the viability of the options specified. Paragraph 190 of the NPPF states that plans should “set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats”. The strategy should take into account (amongst other things) “the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation”.

As set out above, the former First School is Grade II listed and it does not appear as though any work has been carried out on the viability of the development options specified in Policy GAM8. Cambridgeshire County Council, as landowner, are investigating a whole site solution for the redevelopment / disposal of the site. While investigations into alternative uses are still ongoing, it is envisaged that a mixed-use scheme would be the best solution for the site which may include some uses not specified in Policy GAM8. In its current wording, Policy GAM8 does not allow sufficient flexibility for the best whole site solution to be developed. It is not in the interest of Cambridgeshire County Council, the local community, or the preservation of the heritage asset for the site to remain unoccupied for a period of ten years if a compatible and viable scheme cannot be found.

All capital raised from the disposal of the site will also be reinvested into front line services across the county.

Therefore, having regard to national policies and advice contained in guidance, Policy GAM8 is not appropriate and does not meet basic condition A because:

1. The wording of the policy is neither clear nor unambiguous
2. The safeguarding of the site for ten years has not been supported by robust evidence nor taken into account relevant market signals
3. The restriction of potential uses on the site does not provide a positive strategy for the conservation and enjoyment of the historic environment

Condition D: Sustainability

Policy GAM8 restricts possible uses on the site with insufficient flexibility and “safeguards” the former First School buildings and new buildings for a period of ten-years. However, “safeguarding” the former First School buildings and new buildings for this period does not meet the requirement for sustainable development. The former First School is Grade II listed (listing reference 1271139) and it does not appear as though any work has been carried out on viability. The layout and configuration of the building(s) are unlikely to make for an easy conversion. The possibility of the listed asset remaining unoccupied for a period of ten years if a compatible and viable scheme cannot be found does not contribute to the achievement of sustainable development (NPPF, Paragraph 7), nor meet the sustainability objectives (economic, social, or environmental) which should be delivered through the preparation and implementation of plans and the application of the policies in the NPPF (NPPF, Paragraphs 8 and 9). While unoccupied the asset would sit as an unutilised resource; it would not generate any income, it would not benefit the local community, and the upkeep of the heritage asset would be affected.

Condition E: General conformity with the strategic policies contained in the development plan

Condition E requires general conformity with the strategic policies contained in the development plan. Appendix E of the Local Plan identifies the “Strategic Policies” in the South Cambridgeshire Local Plan. Those considered particularly relevant in this case are:

- NH/14: Heritage Assets
- NH/15: Heritage Assets and Adapting to Climate Change

- SC/3: Protection of Village Services and Facilities

Policy NH/14 supports the retention and enhancement of the heritage assets and NH/15 encourages and supports the re-use of historic buildings as a sustainable resource. However, as set out above, the restriction of possible uses and the ten year safeguarding period set out in Policy GAM8 mean the Grade II listed former First School may remain unoccupied for a period of ten years if a compatible and viable scheme cannot be found. This does not conform with strategic policies NH/14 or NH/15. Greater flexibility is therefore required in respect of the potential use of the heritage asset.

Policy SC/3: Protection of Village Services and Facilities seeks to protect villages services and facilities including community buildings such as the former First School. However, Policy SC/3 also recognises the need for flexibility stating that the following matters will be considered in determining the significance of the loss of a village service or facility:

- d) *“The established use of the premises and its existing and potential contribution to the social amenity of the local population;*
- e) *The presence of other village services and facilities which provide an alternative, with convenient access by good local public transport services, or by cycling or walking; and how these remaining uses will cope with displaced users; and any unacceptable impact of those alternative services or facilities;*
- f) *The future economic viability of the use including the results of marketing of the premises for a minimum of 12 months at a realistic price and in appropriate cases financial information.”*

By not including similar measures to allow flexibility, Policy GAM8 conflicts with Policy SC/3 of the Local Plan. The need for flexibility is even more apparent in this case owing to the existing configuration of the building, its age, and its listed status, which mean that a significant amount of investment in the building is likely to be required. No justification or rationale for the non-conformity with Policy SC/3 has been provided within the Neighbourhood Plan. Furthermore, as set out above, no evidence has been provided to justify the “safeguarding” period which has the potential to see the valuable heritage asset and existing resource remain unoccupied for a significant period if a viable scheme cannot be found.

- SC/3: Protection of Village Services and Facilities

Policy NH/14 supports the retention and enhancement of the heritage assets and NH/15 encourages and supports the re-use of historic buildings as a sustainable resource. However, as set out above, the restriction of possible uses and the ten year safeguarding period set out in Policy GAM8 mean the Grade II listed former First School may remain unoccupied for a period of ten years if a compatible and viable scheme cannot be found. This does not conform with strategic policies NH/14 or NH/15. Greater flexibility is therefore required in respect of the potential use of the heritage asset.

Policy SC/3: Protection of Village Services and Facilities seeks to protect villages services and facilities including community buildings such as the former First School. However, Policy SC/3 also recognises the need for flexibility stating that the following matters will be considered in determining the significance of the loss of a village service or facility:

- d) *“The established use of the premises and its existing and potential contribution to the social amenity of the local population;*
- e) *The presence of other village services and facilities which provide an alternative, with convenient access by good local public transport services, or by cycling or walking; and how these remaining uses will cope with displaced users; and any unacceptable impact of those alternative services or facilities;*
- f) *The future economic viability of the use including the results of marketing of the premises for a minimum of 12 months at a realistic price and in appropriate cases financial information.”*

By not including similar measures to allow flexibility, Policy GAM8 conflicts with Policy SC/3 of the Local Plan. The need for flexibility is even more apparent in this case owing to the existing configuration of the building, its age, and its listed status, which mean that a significant amount of investment in the building is likely to be required. No justification or rationale for the non-conformity with Policy SC/3 has been provided within the Neighbourhood Plan. Furthermore, as set out above, no evidence has been provided to justify the “safeguarding” period which has the potential to see the valuable heritage asset and existing resource remain unoccupied for a significant period if a viable scheme cannot be found.

GAM10 – CONTRIBUTIONS TOWARDS PROVIDING NEW INFRASTRUCTURE FOR WALKING, CYCLING AND HORSE RIDING AND APPENDIX 3: DEVELOPER CONTRIBUTIONS

OBJECT

Policy GAM10 requires new residential and business units to contribute towards the provision and maintenance of new paths for the purpose of cycling, walking and horse riding between the village, hamlets, employment sites and neighbouring villages. It sets out the level of contribution required. Appendix 3 sets out further information on developer contributions.

Cambridgeshire County Council objects to Policy GAM10 as it is not considered to meet basic Condition A. Paragraph 005 (Reference ID: 41-005-20190509) and Paragraph 001 (Reference ID: 10-001-20190509) of the NPPG advise respectively that:

“Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy.”

“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106...”

Insufficient evidence has been provided on how the proposed contributions relate to the strategic policies within the Local Plan or how they will impact the deliverability of the neighbourhood plan, local plan, or spatial development strategy. Furthermore, a proportionate assessment of viability has not been provided. The lack of evidence also conflicts with Paragraph 31 of the NPPF and Paragraph 041 (Ref. 41-041-20140306) of the NPPG.

The policy is also ambiguous as the term “business developments” has not been defined so it is not clear what it is intended to include. Paragraph 16(d) of the NPPF and

Paragraph 041 (Ref. 41-041-20140306) of the NPPG require policies be clear and unambiguous, so that it is obvious how the decision maker should apply them.

It should be noted that the former First School Playing Field was not identified as recreation space within the Council's Recreation and Open Space Study (July 2013) nor within the Services and Facilities Study (March 2014).

GAM11 – LANDSCAPE AND NATURAL ENVIRONMENT

OBJECT

Policy GAM11 advises that green spaces within developments should be consolidated to create a network of publicly accessible formal and informal green spaces – green infrastructures – for sport and recreation. Cambridgeshire County Council objects to Policy GAM11 on the grounds that it is not deliverable (as required under Paragraph 16(b) of the NPPF) as not all green space within developments will necessarily be publicly accessible. Therefore, in its current wording the policy does not meet basic condition A.

It is suggested that the words “public open” be inserted at the start of the sentence so that it reads:

“Public open green space within developments should be consolidated to create a network of publicly accessible formal and informal green spaces – green infrastructures – for sport and recreation.”

APPENDIX 2: GAMLINGAY'S GREEN INFRASTRUCTURE

COMMENTS

Appendix 2 identifies sites of sport, recreation and amenity value where residents can come together both informally and where community events are held. The Gamlingay First School playing fields, Green End (0.8 ha) (Asset of Community Value-ACV) is included within the list.

The former First School Playing Field is private land with no public access (including no public rights of way across the land). Access is only granted through private agreements with Cambridgeshire County Council. While the land was previously used for sports and recreation associated with the school use, the school use has now ceased owing to the relocation of the school.

GENERAL

COMMENTS

Reference to the NPPF needs to be updated to the 2021 version.

The conservation area boundary does not exactly follow that drawn on the Local Plan Policy Map for Gamlingay.

Summary of Comments:

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

Cambridgeshire County Council, as landowners of the former First School and Playing Fields, supports / objects / comments on the following policies and paragraphs in the Gamlingay Neighbourhood Plan as they do not meet all of the basic conditions set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

A bullet point summary of the main issues raised is provided below:

- **Objective 1 – Supports:**

- The objective recognises the need for appropriate housing growth in Gamlingay including then need for smaller and adaptable home. This is supported.

- **Objective 4 – Objects:**

- Objects under basic conditions A, D and E:
 - The objective acknowledges Policies GAM7 and GAM8. Cambridgeshire County Council objects to these policies under basic conditions A, D and E (see representations submitted in respect of the said policies below); the objection also applies to Objective 4.

- **Paragraphs 4.12 and 4.13 – Supports**

- Paragraph 4.12 indicates a particular demand for smaller 1-2-bedroom homes and bungalows in Gamlingay and Paragraph 4.13 recommends developers focus on less expensive, smaller, and adaptable 2 to 3-bedroom houses and bungalows. Cambridgeshire County Council supports the provision of smaller homes which could be explored as part of a mixed-use scheme at the former First School site.

- **Paragraph 4.60 – Objects**

- Objects under basic condition A, D and E:
 - Paragraph 4.60 refers to Policy GAM8. Cambridgeshire County Council objects to Policy GAM8 under basic conditions A, D and E (see

representations submitted in respect of the said policies below); the objection also applies to Paragraph 4.60. To produce an effective whole site solution for the former First School buildings it is highly likely that a mixed use scheme will be required. Thus, greater flexibility on the potential future uses is required to ensure a suitable viable scheme can be developed.

- **Paragraph 4.62 – Comments**

- It should be noted that the former First School field is private land with no public access. Access to the former First School field is only granted through private agreements with Cambridgeshire County Council.

- **Policy GAM6 – Objects:**

- Objects under basic condition A:
 - The policy does not define what falls within “amenities and facilities” for the purpose of the policy, or what an applicant is expected to demonstrate to show that “efforts have been made to secure their continued use”. The policy is therefore unclear and ambiguous. It is recommended that the wording be updated to “village services and facilities” in line with the Local Plan to provide more clarity.
- Objects under basic condition E:
 - Policy SC/3 sets out clear guidance on what will be considered in determining the significance of the loss of a village service or facility. Policy GAM6 does not provide a similar level of clarity.

- **Policy GAM7 and Neighbourhood Plan Maps (4, 7, 9, 10 and 11) – Objects:**

- Objects under basic condition A:
 - The policy is not realistic or deliverable as the former First School Field is private land with no public access. It is recommended that the inclusion of “with pedestrian access” be removed from the policy.
 - The Scouts Hut and car park do not fall within the definition of “green areas” to which Local Green Space designations apply. It is recommended that the Scouts Hut and car park be removed from the proposed designation.

- **Policy GAM8 – Objects:**

- Objects under basic condition A:
 - The policy is unclear and ambiguous as the use classes set out are not consistent with the description of “educational or community uses” stated in the policy.

- The safeguarding period of ten years has not been adequately supported by robust up-to-date evidence nor have relevant market signals been considered. Furthermore, the intention or rationale behind the set period has not been explained. It does not appear as though any viability work has been carried, and the possibility of the Grade II listed building remaining unoccupied if a compatible and viable scheme cannot be found does not appear to have been considered.
 - The policy does not set a positive strategy for the conservation and enjoyment of the historic environment which includes putting heritage assets to a viable use consistent with their conservation. The policy restricts the development options available on the site without first having considered the viability of the options specified.
 - Objects under basic condition D:
 - The possibility of the listed asset remaining unoccupied for a period of ten years (the “safeguarding” period) if a compatible and viable scheme cannot be found does not contribute to the achievement of sustainable development. It does not appear as though any work has been carried out on viability and the layout and configuration of the building(s), together with the listed status, are unlikely to make for an easy conversion.
 - Objects under basic condition E:
 - NH/14: Heritage Assets and NH/15: Heritage Assets and Adapting to Climate Change - the restriction of the possible uses and the ten year safeguarding period mean the Grade II listed former First School may remain unoccupied for ten years if a compatible and viable scheme cannot be found. This does not conform with strategic policies NH/14 or NH/15. Greater flexibility is therefore required in respect of the potential use of the heritage asset.
 - SC/3: Protection of Village Services and Facilities - while seeking to protect villages services and facilities, Policy SC/3 also recognises the need for flexibility. By not including similar measures to allow flexibility, Policy GAM8 conflicts with Policy SC/3 of the Local Plan. The need for flexibility is even more apparent in this case owing to the existing configuration of the building, its age, and its listed status. No justification or rationale for the non-conformity with Policy SC/3 or for the safeguarding period has been provided.

- **Policy GAM10 and Appendix 3 – Objects**

- Objects under condition A:

- Insufficient evidence has been provided on how the proposed contributions relate to the strategic policies within the Local Plan or how they will impact the deliverability of the neighbourhood plan, local plan, or spatial development strategy. Furthermore, a proportionate assessment of viability has not been provided.
 - “Business developments” has not been defined so it is not clear what it is intended to include, therefore, the policy is unclear and ambiguous.

- **Policy GAM11 – Objects:**

- Objects under condition A:

- The policy is not deliverable because not all green space within developments will necessarily be publicly accessible. It is recommended that the words “public open” be inserted at the start of the policy.

- **Appendix 2 – Comments**

- The former First School Playing Field is private land with no public access, access is only granted through private agreements with Cambridgeshire County Council.

- **General – Comments**

- Reference to the NPPF should be updated to the 2021 version
 - The conservation area boundary should be updated to follow that drawn on the Local Plan Policy Map for Gamlingay.

Completed forms must be received by 5pm on 23 November 2021 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
Cambourne Business Park, Cambourne,
Cambridge, CB23 6EA

56549

Support

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Mr Simon Fisher

Date received: 20/11/2021 via Email

Summary:

Comment

My comment is specifically about the community gym, currently closed, but cited at Gamlingay Village Primary. We cannot consider this a long term site for the gym and would like to understand if there can be a mid/long term plan to have a longstanding and secure site for this community facility?

Perhaps as part the Old First School development plans (as referenced in GAM8 (4.69))? Or is there another site that could be identified over time?

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s5>

Gamlingay Neighbourhood Plan



Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or neighbourhood.planning@greatercambridgeplanning.org

All comments **must** be received by 5pm on Tuesday 23 November 2021.

Data Protection

We will treat your data in accordance with our Privacy Notices:

www.scambs.gov.uk/planning-policy-privacy-notice/. Information will be used by South Cambridgeshire District Council solely in relation to the Gamlingay Neighbourhood Plan. Please note that all responses will be available for public inspection and cannot be treated as confidential. Representations, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed of future stages of the Gamlingay Neighbourhood Plan?

Please tick: Yes No

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:		Agent's name:	
Name of organisation: (if applicable)		Name of Agent's organisation: (if applicable)	
Address:		Agent's Address:	
Postcode:		Postcode:	
Email:		Email:	
Telephone:		Telephone:	
Signature:		Date:	

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representation number:

Part B – Your Response

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

Policy or Paragraph Number (please state)	GAM6 (4.67)
Do you Support, Object or have Comments? (Please tick)	<input type="checkbox"/> Support <input type="checkbox"/> Object <input checked="" 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.

My comment is specifically about the community gym, currently closed, but cited at Gamlingay Village Primary. We cannot consider this a long term site for the gym and would like to understand if there can be a mid/long term plan to have a longstanding and secure site for this community facility?

Perhaps as part the Old First School development plans (as referenced in GAM8 (4.69))?
Or is there another site that could be identified over time?

Summary of Comments:

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

The long term placement and operational security of a gym facility in Gamlingay

Completed forms must be received by 5pm on 23 November 2021 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
Cambourne Business Park, Cambourne,
Cambridge, CB23 6EA

56550

Support

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** Mr Robert Petch**Date received:** 20/11/2021 via Email**Summary:****Comment**

The Gamlingay community gym, currently closed but hopefully reopening as a non-profit charity in January 2022, is in a building that is part of Gamlingay Village Primary. The long-term future of the gym at this location is uncertain beyond 2024.

The gym is important to people in the village for their physical and mental health, it is essential for the future of the gym to be assured with an alternative location in the village included in the plan. Gamlingay needs this facility for the majority of gym users, many on doctor referral, who can't travel to the alternatives.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s6>

Gamlingay Neighbourhood Plan



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The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed of future stages of the Gamlingay Neighbourhood Plan?

Please tick: Yes No

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:	██████████	Agent's name:	
Name of organisation: (if applicable)		Name of Agent's organisation: (if applicable)	
Address:	██████████ ██████████	Agent's Address:	
Postcode:	██████████	Postcode:	
Email:	████████████████████	Email:	
Telephone:	██████████	Telephone:	
Signature:	██████████	Date: 20/11/2021	

If you are submitting the form electronically, no signature is required.

Completed forms must be received by 5pm on 23 November 2021 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,

Cambourne Business Park, Cambourne,

Cambridge, CB23 6EA

56551

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** Ms Colleen Blyth**Date received:** 21/11/2021 via Email**Summary:**

The plan appears too rigid with regard to currently privately owned open space, which may be gifted to the people of Gamlingay, for the benefit of the village.

It doesn't allow any opportunity for such land to be gifted, assuming it will be green space, despite private land potentially being sold to developers for unpalatable mass housing in future, against affected residents' wishes. A gift in perpetuity to the village would prevent this, and help maintain the character of the village.

The plan ignores the opportunity and potential for such gifts.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s7>

Gamlingay Neighbourhood Plan



Response Form

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Part A – Your Details

Part B – Your Response

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Do you wish to be kept informed of future stages of the Gamlingay Neighbourhood Plan?

Please tick: **Yes** **No**

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:	██████████	Agent's name:	
Name of organisation: (if applicable)		Name of Agent's organisation: (if applicable)	
Address:	██████████ ██████████	Agent's Address:	
Postcode:	██████████	Postcode:	
Email:	████████████████████	Email:	
Telephone:	██████████	Telephone:	
Signature:		Date:	

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representation number:

Part B – Your Response

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

Policy or Paragraph Number (please state) General comments	
Do you Support, Object or have Comments? (Please tick)	<input type="checkbox"/> Support <input type="checkbox"/> <u>Object</u> <input type="checkbox"/> <u>Comment</u>

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.

The plan appears too rigid with regard to currently privately owned open space, which may be gifted to the people of Gamlingay, for the benefit of the village. It doesn't allow any opportunity for such land to be gifted, assuming it will be green space, despite private land potentially being sold to developers for unpalatable mass housing in future, against affected residents' wishes. A gift in perpetuity to the village would prevent this, and help maintain the character of the village. The plan ignores the opportunity and potential for such gifts.

Summary of Comments:

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

--

Completed forms must be received by 5pm on 23 November 2021 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
Cambourne Business Park, Cambourne,
Cambridge, CB23 6EA

56562

Support

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Mr Gordon Brooks

Date received: 23/11/2021 via Paper

Summary:

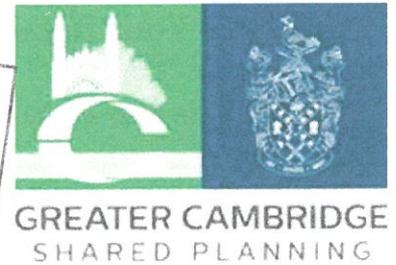
Gamlingay Green

Proposing an additional area for recreational purposes.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4s8>
Representation NP - <https://cambridge.oc2.uk/a/3v4s9>

Gamlingay Neighbourhood Plan

Response Form



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Part B – Your Response

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The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed of future stages of the Gamlingay Neighbourhood Plan?

Please tick: Yes No

P.T.O.

Part A – Your Details

Please note that we cannot register your comments without your details.

Name: [REDACTED]	Agent's name:
Name of organisation: (if applicable)	Name of Agent's organisation: (if applicable)
Address: [REDACTED]	Agent's Address:
Postcode: [REDACTED]	Postcode:
Email: [REDACTED]	Email:
Telephone: [REDACTED]	Telephone:
Signature: [REDACTED]	Date: 21/11/21

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representation number:

Part B – Your Response

What part of the Neighbourhood Plan do you have comments on?	
Policy or Paragraph Number (please state)	
GAMLINGHAY GREEN.	
Do you Support, Object or have Comments? (Please tick)	<input checked="" type="checkbox"/> Support (FOR RECREATION PURPOSE) <input 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.

Summary of Comments:

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

THE SHORT NOTICE GIVEN DOES NOT ENABLE ALL PERSONS TO REPLY. NOT ALL LOCAL PERSONS HAVE IT FACILITIES.

THE NEED FOR THE ADDITIONAL AREA IS GREATER THAN EVER DUE TO THE CONTINUED EXPANSION OF THE AREA THE AREA PROPOSED HAS NOT BE USED FOR AGRICULTURAL PURPOSES FOR MANY YEARS. I SUPPORT THE USE OF THE LAND FOR RECREATIONAL USE.

Completed forms must be received by 5pm on 23 November 2021 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

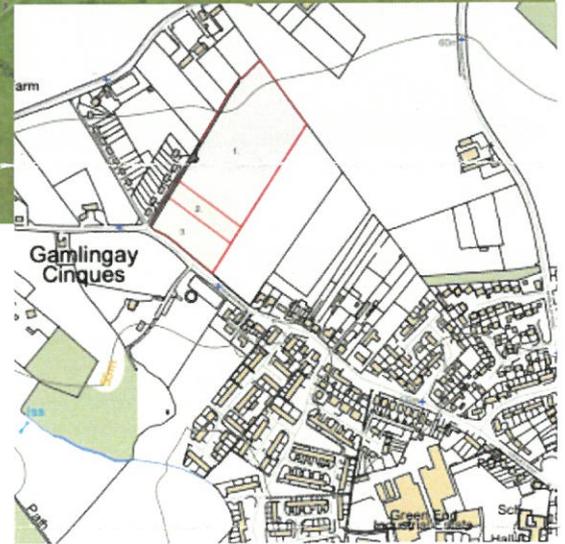
Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
Cambourne Business Park, Cambourne,
Cambridge, CB23 6EA

Gamlingay Green



Gamlingay Green is the gift of a new and usable green space proposal to the people of Gamlingay, and Cinques. It offers a new village green, sporting and outdoor recreational facilities, cycle paths, and the opportunity to create a thriving natural habitat, owned and run by the community.

Under the current Neighbourhood Plan, about to become a fixed set of rules, Gamlingay Green and any similar schemes cannot happen. Unfortunately, no provision exists to even consider it a scheme under the current proposed Gamlingay Neighbourhood Plan.



There is still time for you to show that you would welcome real proposals to add to the quality of life in Gamlingay

Greenspace & Nature

New village green walks, a safe accessible space, a wider variety of planting, wildlife, and flower meadows, many more native trees, sheltered picnic areas, opportunities for growing produce and much more.

Health, wellbeing & recreation facilities

New outside and inside gym facilities, sports pitch, planned cycle ways and pavilion.

Creating living places that matter

A new place - is the quality of planned and recent new housing working in Gamlingay for all, with a sense of place?

Is it planned so that peoples' involvement and sense of attachment will help them develop their special character - to make the kind of well-regarded traditional neighborhoods, we all grow to love and that have added value?

A real location for a real project - if we really want to promote exemplar schemes and keep pace with change as forward thinking communities do in other parts of the country, we need real locations, ideas, and tangible proposals in which people can become involved. Bespoke projects which have community backing need to be considered fairly, on their merits, and not ruled out by 'blanket policies'. that leave no alternative routes for consideration. But there are none in the Neighbourhood Plan ...just restrictive policies, with 'hoped for projects' with no certainty or guarantee of ever coming to fruition.

Gamlingay Green is for real and meets the objectives of ensuring the preservation of the identity of Gamlingay and Cinques by allying it to new community benefits... for all time.

Dear fellow Gamlingay Residents

The concept of new green space and amenities is unfortunately not supported by your District Councillor.

This may be logical a stance to take because our Gamlingay Green proposals do not meet one of the policy constraints in your Neighbourhood Plan which is due to be voted on soon.

But does that fixed view tell us something worrying about inflexibility in the plan and a failure to look for innovative opportunities for the village that just haven't been explored?

As it stands, nothing good will happen to the land at all for the next 20 years (2041).

This is a waste. It is being genuinely offered as a space and for recreation and all manner of uses within walking and cycling distance in an area of the village that really needs it.

This sort of scheme, where 90% of the space is transferred into the custodianship of Gamlingay for useful purposes to preserve the space between village and hamlet, funded by a new mixed tenure residential use barn as an integral part is balanced, progressive and reasonable.

It is a way to ensure that the perimeter threshold of Gamlingay does not become typified by 'anyplace' housing.

Gamlingay could be an alternative exemplar and precedent, demonstrating to preying developers with their suburban style 'add-ons', that they will have to take a more holistic bespoke approach as they circle Gamlingay, looking for sites for their standard 'product'.

No plan will safeguard Gamlingay entirely. Policies change. Government's change. 5-year land supplies fail.

The safest way to stop detrimental development on our important key sites is for Gamlingay to own its green spaces and places and secure it – to free it from the sprawl and mass housing threat, forever.

Gamlingay Green is local landowner derived, not national developers, who have knowledge of the history and who lived there with a genuine interest in improving it, remaining, and living there.

If you believe Gamlingay Green, and schemes like it, are proportionate and reasonable and do not destroy the area, and would like to see new place creating schemes like Gamlingay Green considered to become a reality now, and in the future, please consider commenting on the following:

Greenspace

- You believe we do need to identify and create more green space and habitats for diverse nature and wildlife now and preserve them in community ownership.

Do we have enough open and available safe greenspace in Gamlingay in the right locations to serve all of us?

Health, wellbeing & sport

- Is it agreed that we need more facilities such as gym, cycling, sports for recreation, health and wellbeing urgently?

Are there enough actual and planned outdoor and leisure and recreation facilities, in the village for all of us?

Housing

- It's true that elderly people, young people, upsizers, downsizers, and those seeking starter units are priced out of Gamlingay and that housing needs constantly change?

You can help us make realise the vision and move the dialogue forward.

How? Sending your comments on any or all of the above points to SCDC.

Visit www.gamlingay-green.co.uk and click on **NP** where you can download the form.

email the form to: neighbourhood.planning@greatercambridgeplanning.org by 5 pm **Tuesday 23rd November**



56576

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** Wyboston Lakes Limited**Agent:** Brown & Co Barfords**Summary:**

It is considered the plan as currently drafted does not meet the basic conditions of being compliant with national policies and advice, and elements are not in conformity with the adopted development plan. Overall, this will frustrate the delivery of some sustainable developments.

As explained in the accompanying representation letter the particular issues relate to paragraphs 1.8, 2.13, 4.24, 4.25, 4.32, 4.35, 4.77, 4.81, 4.82, 4.95, 4.96 and Appendix 3.

Attachments: Cover Letter - <https://cambridge.oc2.uk/a/3v4sv>
Gamlingay NP - <https://cambridge.oc2.uk/a/3v4sb>

Our ref: MLP/[REDACTED] 029245

Your ref:

22 November 2021

Greater Cambridge Shared Planning Policy Team,
South Cambridgeshire District Council,
Cambourne Business Park,
Cambourne,
Cambridge,
CB23 6EA



St Neots Office



E [REDACTED]
T [REDACTED]
W brown-co.com

EMAIL ONLY

Dear Sir/Madam,

GAMLINGAY NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION

We are instructed to submit the following representations on behalf of [REDACTED]

[REDACTED] has previously contributed to the preparation of the Neighbourhood Plan at various stages, including the Regulation 14 consultation. This does raise a procedural point that despite the earlier involvement, no formal notification was received from the South Cambridgeshire District Council of the latest consultation exercise, and it was purely by luck that we became aware of this. This gives rise to the question whether all parties who have previously commented have been consulted?

[REDACTED] raise objections in respect of the following elements of the Regulation 16 consultation plan that require further explanation and consideration:

Page	Para.	
11	1.8	The paragraph states ‘Once the Plan has secured the consent of local people via a referendum, the community will be in a position to benefit from 25% of the Community Infrastructure Levy (CIL).....’ It is highlighted that any benefit is firstly dependent on the South Cambridgeshire District Council adopting a Community Infrastructure Levy and this is by no means certain. Secondly, the ability to realise CIL proceeds is reliant on new additional development permissions coming forward after the CIL is introduced. Given the Neighbourhood Plan does not allocate new housing development, and this concludes the village has already exceeded its quota of new windfall housing for the period to 2031 (Para 4.10), it is questionable whether and what level of CIL receipts could be realised. Although new employment development is encouraged, this may not attract any CIL receipt. Therefore, the statement of benefiting from CIL proceeds may be construed as misleading.
21	2.13	States “Land at North, South and East of Tempsford (6 miles away from Gamlingay) has been safeguarded in the Central Bedfordshire Local Plan for future development, to be assessed further in the Partial Plan Review to consider the potential capacity for 10,000+ homes”. However, it is highlighted that the corridor option was removed in the Central Bedfordshire Local Plan 2015 - 2035 document adopted in July 2021.
40	4.24	Policy GAM1 – New buildings and employment buildings states “New housing developments (including applications made for a single property at a time)

will.....provide a mix of homes, in particular one or two-bedroom dwellings and bungalows". We must query the justification for this policy bearing in mind that 47% of those who responded to the Housing Needs Survey questionnaire (Q17) expressed a desire for 3+ bedroom accommodation.

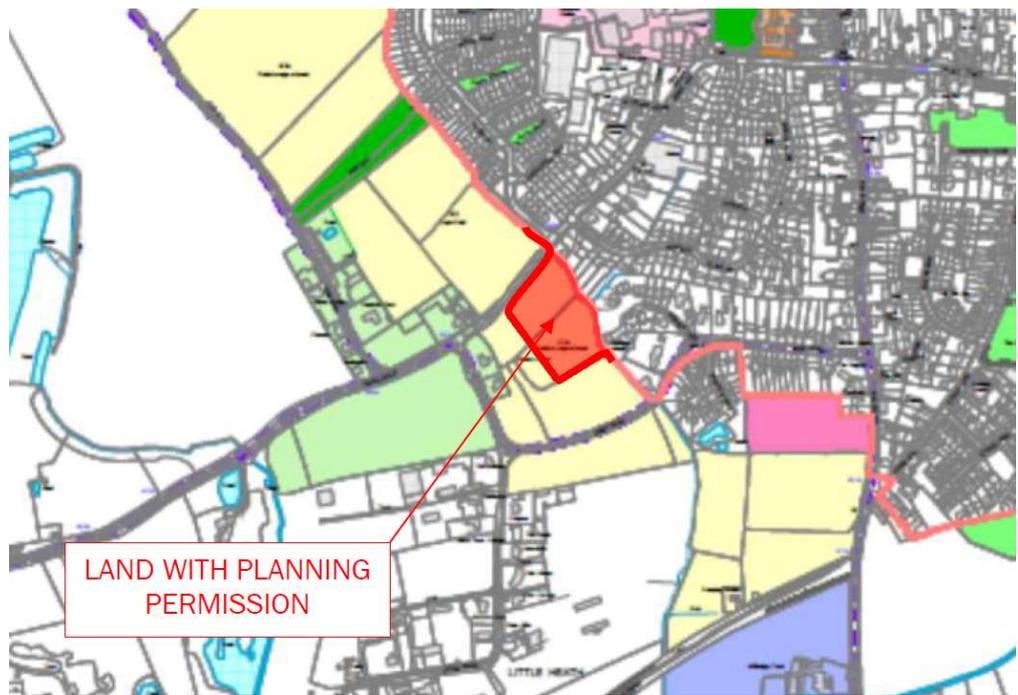
Additionally, given the Neighbourhood Plan does not allocate new housing development and concludes the village has already exceeded its quota of new windfall housing for the period to 2031 (Para 4.10), and that planning permission already exists for the Green End Industrial Estate site and West Road allocations and land off Heath Road, it is questionable whether more affordable 1 or 2-bedroom dwellings or bungalows can be expected to come forward in the plan period?

The policy states applications made for a single property at a time will be expected to provide a mix of homes, in particular one or two-bedroom dwellings. However, how can a planning application for a single dwelling include such a mix?

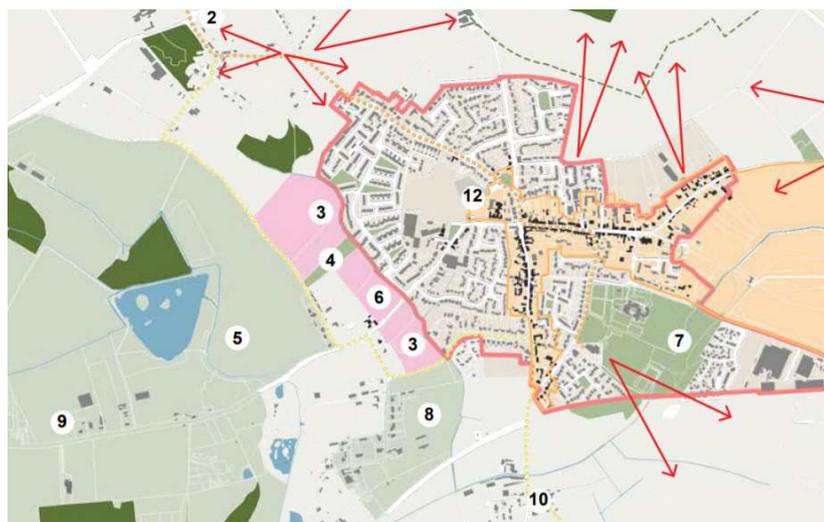
The Policy states new housing developments include *"dwellings that exceed the baseline policy requirements for environmental sustainability set out in the Local Plan. In order to respond to the Climate Emergency all new housing should be insulated to Energy Performance Certificate rating A"*. Whilst supporting these 'green' initiatives, it is highlighted this will have financial consequences and potentially impact on the viability of developments and there is no evidence that the financial consequences been fully evaluated and considered. The additional cost could also conflict with the parish aspiration for smaller more affordable housing (para 4.22).

- 4.25 The paragraph states that *"Since the adoption of the Local Plan in 2018, planning permission has been granted (in both case on appeal) for a further 29 dwellings south of West Road in Gamlingay and for nine self-build dwellings adjacent to Heath Road. The Neighbourhood Plan Steering Group have been advised that the West Road site should now be allocated in the Neighbourhood Plan because by allocating sites and meeting the identified housing requirement, the Neighbourhood Plan fully accords with the requirements of paragraph 14 of the NPPF in meeting the identified housing requirement in full and providing some certainty in determining proposals for new housing should the District Council not be able to demonstrate a five-years supply of housing sites in the near future. There is no requirement for the Neighbourhood Plan to bring forward further sites for development for the period 2020 – 2025"*. The plan then proceeds to allocate the land at West Road under Policy GAM2.

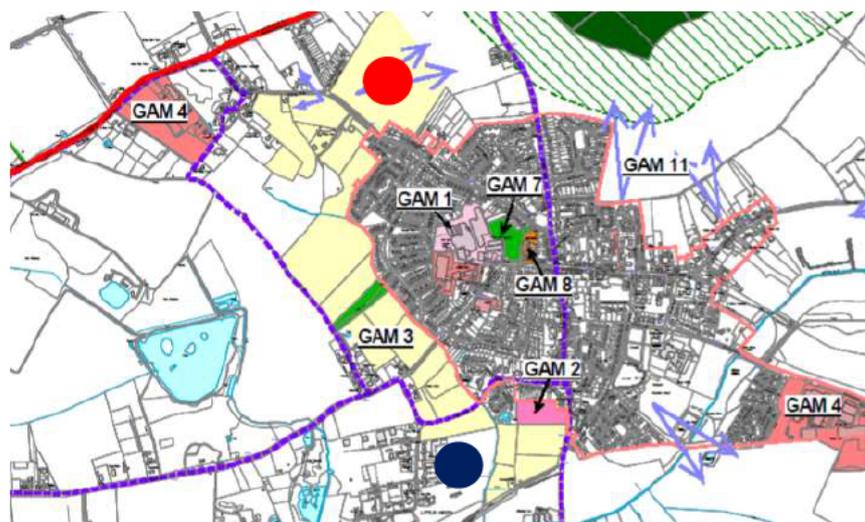
However, the West Road circumstances are not dissimilar to the land off Heath Road, where permission was granted on appeal in September 2019 for the development of up to 9 self build/custom build plots (LPA Ref S/3170/17/OL). This was granted as a departure from the adopted Local Plan considering the need to ensure sufficient self-build plots to meet the statutory duty under Section 2A of The Self Build and Custom Housebuilding Act 2015 (as amended). A reserved matters submission for the Heath Road site is currently being prepared and this development contributes to meeting the Council's housing need and forms part of its 5-year housing land supply. The failure of the Neighbourhood Plan to acknowledge the existing permission is therefore inconsistent, illogical and erroneous. For clarity the plan and maps should amended to include this now committed area, as identified below.



43 4.32 It is stated the “The Village Design Guide identified a ‘sensitive village edge’ bounded by the brook and Great Heath and including the Lupin Field and Log Field to the south west of the village. It also advised maintaining the integrity of the hamlets, in particular the separation of The Cinques and Little Heath, by retaining the open landscape character between these and the village. This ‘settlement gap’ between the village, The Cinques, Dennis Green and Little Heath is coloured yellow on Map 4 showing landscape setting and Map 7 the policy areas”. The inference is that the yellow shaded areas on the Key Policy Areas Map and maps 2, 4 and 5A are derived from Village Design Guide SPD, which has not been subject to examination. However, it is highlighted the Neighbourhood Plan includes additional ‘sensitive village edge’ areas not included in the Village Design Guide, as seen in the extracts below.



Extract from the Village Design Guide SPD with the ‘sensitive village edge’ areas shaded pink.



Extract from the consultation Plan with the 'sensitive village edge' areas shaded yellow.

The consultation plan document provides no explanation for the identification of the yellow character areas in terms of their particular significance and qualities, how they were selected and their specific justification. For example, why is the field identified with the red dot above selected, yet the field identified by the blue dot (which has more significance to the Little Heath separation) is not?

Noting that some of the 'sensitive village edge' areas are incorporated within the Village Design Guide SPD, it is pointed out representations were submitted in respect of the Village Design Guide querying the criteria against which these were assessed. This query was not addressed by the South Cambridgeshire Council when the Design Guide was adopted and having subsequently raised this it has been highlighted by the District Council that the Design Guide "is a supplementary planning document and not a development plan document". The explanation highlights that the Neighbourhood Plan, which will be a development plan, should explain the criteria for the selection of the 'sensitive village edge' areas, and how these have been objectively assessed.

Within the Plan there is ambiguity whether the yellow areas are 'sensitive village edge' areas (as referred to in paras 4.28 & 4.32 and the key to the maps) or a 'settlement gap' (paras 4.32, 4.33, 4.35 and GAM3). What is it? Policy GAM3 states "*Housing will be located within the boundary of Gamlingay village (its development framework) to prevent the village, the hamlets and smallholdings from joining up, to preserve the visual quality of the landscape and retain the separate identities of the settlements. Particular emphasis is placed on the settlement gap between Cinques, Dennis Green and Little Heath identified in the Policies Map*". Considering the explanation surely the 'gap' should embrace all the land between the village, and The Cinques, Dennis Green and Little Heath, and not just some of the fields on the edge of the village?

Acknowledging the aim to protect the countryside, it is pointed out there is already adequate policy protection in place through the adopted Local Plan due to:

- Policy S/7: Development Frameworks clarifies that outside of development frameworks, only allocations within Neighbourhood Plans and development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside or where supported by other policies in the plan will be permitted.

- Policy NH/2: Protecting and Enhancing Landscape Character requires development to respect, retain or enhance the character and distinctiveness of the local landscapes and national character areas;
- NH/3: Protecting Agricultural Land clarifies planning permission will not be granted for development which would lead to the irreversible loss of Grades 1, 2 or 3a agricultural land;
- Policy NH/13: Important Countryside Frontage identifies important countryside frontages and states that planning permission for development will be refused if it would compromise important countryside frontages;
- Policy NH/14 Heritage Assets supports development that will enhance and sustain heritage assets such as buildings, monuments, sites, places, areas or landscapes which are significant because of their historic interest.

Considering the advice that neighbourhood plans should not repeat policies of the Local Plan and the policy measures that are already in place to protect the open countryside from harmful development, there is no justification or necessity for the designation of the 'sensitive village edge' character areas.

Further, as already highlighted, planning permission has been granted on appeal for the development of up to 9 self build/custom build plots on land off Heath Road, which the consultation plan proposes to designate a 'sensitive village edge'. As already noted, the failure of the Neighbourhood Plan to acknowledge the existing commitment is illogical and erroneous. Additionally, when considering the appeal, the Inspector had regard to the Parish Council's desire to ensure separation between the edge of Gamlingay and the hamlet of Dennis Green. In paragraph 17 of the decision letter, he noted *"In the wider context, the appeal site sits in between the edge of Gamlingay and the hamlet of Dennis Green. The separation between them is recognised by the Parish Council in its Village Design Guide as serving an important spatial function, keeping the settlements from merging. It is desirable to maintain this separation to preserve the historic character of the hamlets and to respect their identity"*.

However, the Inspector went on to conclude *"The development of the appeal site would maintain a reasonably substantial area of open land in between the two settlements"*. Also, acknowledging further land owned by the applicant and outside of the site, the Inspector concluded this *"area of land that would continue to serve the purpose of keeping Gamlingay and the nearby hamlets physically separate. Whilst the proposals would bring the built form of the hamlets closer, for the reasons outline above, the development would not encroach upon the character or landscaped setting of the hamlets to a significant degree"* (para 18). In light of the Inspector's assessment the inclusion of the land south of Heath Road as a 'sensitive village edge' is inappropriate and not justified. The Inspector's assessment also highlights that beyond the areas identified as 'sensitive village edge' in the Plan there will remain open land that will continue to serve the purpose of keeping Gamlingay and the nearby hamlets physically separate and this further undermines the purpose of the identified yellow areas.

- 45 4.35 Paragraph 4.26 of the Regulation 14 consultation plan noted *'There is an appetite for self-build housing in the Parish, in the right place'*. In response to this SCDC noted *"Paragraph 4.26 mentions that there is an appetite within the village for self-build housing in the Parish but does not then go on to include a policy to support these. This could be a missed opportunity to promote such development within the parish. Are*

there any suitable sites that were considered other than that which already has permission at the Green End site? Could you include a criteria-based policy to help a future self-build site come forward – what criteria would a site require to be suitable? Near the village centre?” (Non-BC test) (para 66). Disappointingly, in the Regulation 16 consultation the plan now states *“While there is an appetite for self-build housing in the parish, the high cost of land means it is only affordable for a small number of people.....”* This dismissal of the merits of self build and custom build development is clearly at odds with National Planning Policy Framework, the national planning guidance and the statutory duty under Section 2A of The Self Build and Custom Housebuilding Act 2015 (as amended), which require local planning authorities to ensure sufficient land is allocated to meet the self build need. As of 31st October 2021 the SCDC was required to have granted permission for a minimum of 298 serviced plots to meet its duty, which it had not achieved and the high demand for serviced plots has been reflected in enquires that have been received for the Heath Road site, and the take up of a 9 plots self build development in Caxton. The Neighbourhood Plan dismissal of self build development therefore seems to be ‘out of kilter’ with the high level of interest in such schemes.

59 4.77 Refers to the fact the Parish Council have *“commissioned Sustrans to assess the feasibility of a shared use cycle route between Gamlingay and Potton – the Cycle and Footway Improvement Plan (CFIP) (2019)”*. However, this plan has no formal status and surprisingly the delivery of the cycle and footway improvements do not form a specific objective or policy within the Neighbourhood Plan. As a result, the Cycle and Footway Improvement Plan has no formal policy delivery strategy.

61 4.81 Policy GAM9 – Transport provision on developments states *‘....new housing will be located within convenient walking or cycling distance to village facilities. All developments (including employment sites) should provide new pavements and shared use paths/cycleways where there is poor or no existing provision....’* It is considered the policy is ambiguous and this should clarify when and how a path/cycleway is ‘poor’ and whether the required improvement will be limited to the site frontage or more distant connections and to what destinations? This should also be proportionate to the needs and demands of the particular development. For example, a single new dwelling will be unlikely to have a material impact on footway or cycleway needs or what if improvements are not achievable within the available public highway, or these would have a harmful impact on heritage assets?

The policy states *“Housing developments are expected to provide enough car parking for residents and visitors within the development envelope”*. What level of parking provision is intended? Considering the advice that neighbourhood plans should not repeat policies of the Local Plan it is highlighted Local Plan Policy TI/3 already requires car parking provision should be provided through a design-led approach in accordance with the indicative standards set out in the Local Plan. Regarding the parking element of Policy GAM9 this is considered unnecessary, unless the Neighbourhood Plan is seeking a different level of parking provision?

62 4.82 Policy GAM10 – requires *“New residential and business units are expected to help mitigate their impact on the local road network by contributing £21 per m2 of floor space (for business developments), and £10 per m2 of floor space (for housing developments) towards the provision and maintenance of new paths (see Map 10) for the purpose of cycling, walking and horse riding between the village, hamlets,*

employment sites and neighbouring villages". However, as already noted, there is no specific policy strategy within the consultation Neighbourhood Plan in respect of securing the provision and maintenance of new paths for the purpose of cycling, walking and horse riding between the village, hamlets, employment sites and neighbouring villages. Whilst acknowledging the Sustrans Gamlingay Cycleway Improvement Plan, it is highlighted this did not address horse riding routes and the greater part of the proposed improvements in fact lie within the Central Bedfordshire authority and the parish of Potton to the south of Gamlingay.

It is highlighted that in response to the previous draft document SCDC noted *'The Gamlingay Cycle and Footway Improvement Plan states it is estimated that the construction costs for the path alone will be at least £1M. This excludes land acquisition costs and any bridge works. However only part (around half) of the cycle route is within Gamlingay. To justify the level of contribution sought it may be necessary to understand the cost associated with the part of the route that is within Gamlingay Parish Council boundary'*. (BC test) (para 117). This is not considered to have been addressed.

Section 122 of the Community Infrastructure Levy Regulations 2010 clarifies that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

Additionally, the National Planning Guidance is clear that planning obligations can only be required to mitigate the impact of unacceptable development that will make it acceptable in planning terms (Paragraph: 002 Reference ID: 23b-002-20190901). It is clearly the case that for example a development on one side of the village cannot reasonably be directly related to providing a horse-riding route on the other side of the village. Also providing a horse-riding route will not reasonably be necessary or the difference between an acceptable and unacceptable development. Consequently, Policy GAM10 is not in accordance with the Community Infrastructure Levy Regulations 2010.

Paragraph: 011 Reference ID: 23b-011-20190315 of the National Planning Guidance also clarifies *"Plans should be informed by evidence of infrastructure and affordable housing, and a proportionate assessment of viability that takes into account all relevant policies"*. Reviewing the consultation plan and supporting documents there is no evidence that the required assessment of viability has been undertaken.

The National Planning Policy Guidance further clarifies plan makers should ensure that policy requirements for contributions from development are deliverable. The Sustrans Gamlingay Cycleway Improvement Plan identifies the construction cost of the proposed improvements would be at least £1M just for the path itself, excluding land acquisition costs. Bearing in mind the routes identified on the Map 10 Walking Cycling and Horse-Riding Routes include additional schemes not identified in the Sustrans Plan, the costs will clearly be even greater. Considering the Neighbourhood Plan does not allocate new housing development, and this concludes the village has already exceeded its quota of new windfall housing for the period to 2031 (Para 4.10), and that planning permission already exists for the Green End Industrial Estate and West Road allocations, the reality is the very restricted further future development scope can be expected to deliver only limited funding. For example, if 10 further properties were to come forward in the plan

period this could potentially deliver £29,410 using the Parish Council's methodology with an average household size of 100 m². This will be likely to cover no more than the engineering design costs for the improvements and it will not realise a sufficient fund to enable the improvements to be delivered. Regardless of funding, there is also no certainty the improvements are deliverable as these are dependent on securing the necessary land.

In the response to the previous draft document, it is highlighted SCDC noted "*Policy GAM10 requires contributions of £21 per m² of floor space (for business developments), and £10 per m² of floor space (for housing developments). We would suggest the plan should seek to explain how these contributions have been arrived at and also estimate the likely level of contribution that may be secured over a period of time (say 10 years) in order to provide some certainty that the scheme will be delivered. If the estimated level of contributions are unlikely to be paid for by new developments alone then we would suggest the plan should set out potential alternative funding schemes that may be available in order to achieve its delivery.* (BC test)" (para 118). This is not considered to have been addressed.

- 67 4.95 States "New development should not obstruct or harm the special views and vistas identified by the Village Design Guide". However, as previously noted, the Design Guide is a supplementary planning document and not a development plan document, and this has not been subject to examination. Additionally, the Design Guide provides no explanation for the identification of the views or vistas in terms of their special qualities or how these were assessed against any objectively assessed criteria. This was highlighted during the Village Design Guide consultation, but no explanation or consideration of the objection was provided by the District Council.
- 67 4.96 Policy GAM11 – Landscape and natural environment requires that developers deliver "measurable, proportionate and appropriate biodiversity net gains (in line with national policy.....". Given the provisions within the Environmental Act and the acknowledgement the policy is in line with national policy, the first paragraph of policy GAM11 is unnecessary.
- 74 Appendix 3: Developer contributions, aims to provide clarity for the infrastructure costs and contributions sought through policy GAM10, however, this is inadequate in the following respects:
- It is stated that providing the 12.5km of new cycleway is costed at £5 million **excluding land costs**. However, the greater part of the proposed improvements in fact lies within Central Bedfordshire, a different local authority to the south of Gamlingay and it would be unreasonable to require development in Gamlingay to fund improvements in a different authority;
 - The explanation pro ratas the costs over the Gamlingay housing stock number, however it does not acknowledge the element of works within the adjoining parish of Potton and the housing stock in that settlement. This has the consequence of inflating the cost in the methodology used by the Parish Council;
 - The explanation does not address how the £21 per m² for new employment development has been arrived at. This could put a significant barrier in the way of delivering new business growth.

- There is no evidence that the required assessment of viability has been undertaken.
- It is inescapable that the delivery of the improvements is very unlikely given the limited quantum of new development that is expected and could be required to make contributions.

For the above reasons proposed policy GAM 10 is not justified or sound, and it does not comply with the Community Infrastructure Levy Regulations 2010 nor national planning guidance.

It is highlighted that financial contributions sought through policy GAM10 will have to be secured through a S106 agreement between the Parish Council and the applicant/developer, adding costs and delay to the development process. To address this the Plan proposes a standardised template legal agreement for individual/small scale property development, like the one in use by Huntingdonshire District Council. However, we highlight the Huntingdonshire Unilateral Undertaking arrangement is only used by the authority to address the provision of wheeled bins and this does not address financial payments for infrastructure improvements. The National Planning Guidance (Paragraph: 021 Reference ID: 23b-021-20190315) clarifies *“Local planning authorities are expected to use all of the funding received by way of planning obligations, as set out in individual agreements, in order to make development acceptable in planning terms. Agreements should normally include clauses stating when and how the funds will be used by and allow for their return, after an agreed period of time, where they are not”*. To enable this developers will expect the Parish Council to enter an obligation that will commit it to spend the money appropriately and to refund any unspent money, which can only be secured through a formal much more costly and protracted S106 agreement.

Conclusions

For the reasons explained above it is considered the plan as currently drafted does not meet the basic conditions of being compliant with national policies and advice, and elements are not in conformity with the adopted development plan. Overall, this will frustrate the delivery of some sustainable developments.

We would be grateful to receive an acknowledgement in respect of the above representation and to be kept advised on the consideration of our points and the progress of the Neighbourhood Plan.

Y
[Redacted Signature]

MARTIN PAGE MRTF

For and on behalf of Brown & Co - Property and Business Consultants LLP
t/a Brown & Co Barfords

Mob: [Redacted]
DDI: [Redacted]

Gamlingay Neighbourhood Plan



Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or

neighbourhood.planning@greatercambridgeplanning.org

All comments **must** be received by 5pm on Tuesday 23 November 2021.

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We will treat your data in accordance with our Privacy Notices:

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Please note that all responses will be available for public inspection and cannot be treated as confidential. Representations, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed of future stages of the Gamlingay Neighbourhood Plan?

Please tick: Yes No

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:	██████████	Agent's name:	Martin Page
Name of organisation: (if applicable)	████████████████████	Name of Agent's organisation: (if applicable)	Brown & Co Barfords
Address:	██████████ ██████████ ██████████ ██████████	Agent's Address:	The Fairways Wyboston Lakes Great North Road Wyboston Bedfordshire
Postcode:	██████████	Postcode:	MK44 3AL
Email:		Email:	████████████████████ ██████████
Telephone:		Telephone:	██████████████████
Signature:		Date:	22.11.21

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representation number:

Part B – Your Response

What part of the Neighbourhood Plan do you have comments on?	
Policy or Paragraph Number (please state)	Paragraphs 1.8, 2.13, 4.24, 4.25, 4.32, 4.35, 4.77, 4.81, 4.82, 4.95, 4.96 and Appendix 3.
Do you Support, Object or have Comments? (Please tick)	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Object <input checked="" 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. Refer to accompanying representation letter.	
Summary of Comments: If your comments are longer than 100 words, please summarise the main issues raised. It is considered the plan as currently drafted does not meet the basic conditions of being compliant with national policies and advice, and elements are not in conformity with the adopted development plan. Overall, this will frustrate the delivery of some sustainable developments. As explained in the accompanying representation letter the particular issues relate to paragraphs 1.8, 2.13, 4.24, 4.25, 4.32, 4.35, 4.77, 4.81, 4.82, 4.95, 4.96 and Appendix 3.	

Completed forms must be received by 5pm on 23 November 2021 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
Cambourne Business Park, Cambourne,
Cambridge, CB23 6EA

56584

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: LJA Miers Executive Pension Fund

Agent: Brown & Co Barfords

Summary:

GAM4

The local employment site in Church Street, as indicated in Policy GAM4, should be removed from the Neighbourhood Plan. The accompanying letter explains the lack of clarity in this policy, policy conflict with the Local Plan as well as highway safety and noise issues related to this site.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4sc>
Representation Letter - <https://cambridge.oc2.uk/a/3v4sd>

Our ref: SHS/[REDACTED]
Your ref:

23 November 2021

Greater Cambridges Shared Planning Policy Team
South Cambridgeshire District Council
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA



St Neots Office

The Fairways
Wyboston Lakes
Great North Road
Wyboston
Bedfordshire
MK44 3AL

E [REDACTED]
T [REDACTED]
W brown-co.com

EMAIL ONLY

Dear Sir/Madam

GAMLINGAY NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION

We are instructed by [REDACTED], to submit the following objections to the Gamlingay Neighbourhood Plan Regulation 16 consultation and in particular Policy GAM4.

The proposed Local Employment Site to the rear of the pharmacy on Church Street is not a suitable location for employment and this site should be removed from Policy GAM4.

Background

The [REDACTED] own commercial premises to the rear of 33 and 37 Church Street, Gamlingay. These comprise a 482 m² warehouse with offices measuring 157m².

To the south of the site owned by [REDACTED] are further commercial buildings which are in different ownership and were formerly a glove factory. There is a shared private accessway off Church Street, Gamlingay to access these sites.

Within the Neighbourhood Plan is Map 5A: Employment (Business Sites). This map, together with Policy GAM4, lack clarity of the precise areas proposed under Policy GAM4. Due to the size and scale of the map the site outlined within Church Street is not clearly legible. It is suggested that a larger map is produced to provide further clarity of the local employment site on Church Street.

Policy GAM4 – Local Employment Sites

Policy GAM4 in the Gamlingay Neighbourhood Plan proposes the following:

Policy GAM4 – Local Employment Sites supports business within Church Street for employment uses E(g). This Use Class includes:

- (i) An office to carry out any operational or administrative functions;
- (ii) The research and development of products or processes; or
- (iii) Any industrial process

Being a use, which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

GAM4 - Local Employment Sites states that all applications will need to demonstrate that there will be no adverse impact on the amenity or property of nearby residents.

Issues

1. Policy Conflict. Policy GAM4 lacks clarity when referring to Church Street as a Local Employment Site for uses E(g). The inference for the reader is that all buildings with Use Class E(g) within Church

Street should remain as such for perpetuity. If this is the situation then there are duplications given Policy E/14: Loss of Employment Land to Non Employment Uses in the South Cambridgeshire (2018) Local Plan. Policy E/14 in the Local Plan states that conversion, change of use or redevelopment of existing employment sites to non-employment uses could be permitted provided they meet certain criteria. Therefore, Policy GAM4 is in conflict with the Local Plan.

2. Highway Safety. Church Street is a mixed residential and commercial area with limited off-street parking. The street is also on a bus route and has traffic calming measures. There is congestion within this area partly due to the parking on the public highway as well as the periodic loading and unloading of commercial vehicles that serve the local amenities. The road is narrowed by vehicles parking on the street, causing further obstructions. The accessway to the commercial buildings situated between 33 and 37 Church Street is narrow, the narrowest point of the accessway measuring less than 4m in width. There are two small turning areas opposite the commercial buildings which are unsuitable for large vehicles. Heavy goods vehicles (HGVs) use the narrow accessway to the commercial area to deliver goods to and from these commercial units. Due to the width of the accessway there is insufficient space for two vehicles to pass one another. HGVs visiting the site struggle to manoeuvre to access the 4m wide accessway as can be seen in the photo below (Figure 1). The driver is impeded by the parked cars as well as the narrow access and HGV deliveries to the commercial premises results in total congestion in the street.



Figure 1 – Lorry trying to access employment site on Church Street

2. Noise. There are residential properties adjacent to the commercial premises. There has been anecdotal evidence that the employment site at 35 Church Street has adversely impacted on the amenity or property of nearby residents in the past. This is supported at paragraph 4.51 of the Neighbourhood Plan which states:

3.

51% disagreed or strongly disagreed with further development on Church Street (behind the pharmacy).

It is understood complaints regarding noise and traffic generated by this employment site have been made by residents to the Council. The Council may hold further historic information about this site which we are unable to access following changes to their procedures since COVID-19.

Conclusions

For the reasons explained above it is suggested that the employment site accessed between 33-37 Church Street, behind the pharmacy, should be deleted from the Policy GAM4 of the Neighbourhood Plan and the maps. This would enable the site to come forward in the future for residential development without conflicting with the Neighbourhood Plan.

We would be grateful to receive an acknowledgement in respect of the above representation and to be kept advised on the consideration of our points and the progress of the Neighbourhood Plan.

Yours sincerely

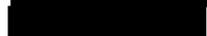


Susan Shenston MSc MA BSc (Hons)

Town Planner - Planning

For and on behalf of Brown & Co - Property and Business Consultants LLP
t/a Brown & Co Barfords

Mob: 

DDI: 

Gamlingay Neighbourhood Plan



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Do you wish to be kept informed of future stages of the Gamlingay Neighbourhood Plan?

Please tick: Yes No

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:	██████████	Agent's name:	Susan Shenston
Name of organisation: (if applicable)	████████████████████ ██████████	Name of Agent's organisation: (if applicable)	Brown & Co Barfords
Address:	████████████████████ ██████████ ██████████	Agent's Address:	The Fairways Wyboston Lakes Great North Road Wyboston Bedfordshire
Postcode:	██████████	Postcode:	MK44 3AL
Email:		Email:	████████████████████ ██████████
Telephone:		Telephone:	██████████
Signature:		Date:	23.11.21

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representation number:

Part B – Your Response

What part of the Neighbourhood Plan do you have comments on?	
Policy or Paragraph Number (please state)	Policy GMA4
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. Refer to accompanying representation letter.	
Summary of Comments: If your comments are longer than 100 words, please summarise the main issues raised. The local employment site in Church Street, as indicated in Policy GAM4, should be removed from the Neighbourhood Plan. The accompanying letter explains the lack of clarity in this policy, policy conflict with the Local Plan as well as highway safety and noise issues related to this site.	

Completed forms must be received by 5pm on 23 November 2021 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
Cambourne Business Park, Cambourne,
Cambridge, CB23 6EA

56586

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** Merton College**Agent:** Brown & Co Barfords**Summary:**

It is considered the plan as currently drafted does not meet the basic conditions of being compliant with national policies and advice, and elements are not in conformity with the adopted development plan. Overall, this will frustrate the delivery of potentially sustainable developments and revisions to address the above points are necessary.

As explained in the accompanying representation letter the particular issues relate to paragraphs 1.8, 2.13, 4.24, 4.32, 4.77, 4.81, 4.82, 4.95, 4.96, 4.97 and Appendix 3.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4sw>Representation - <https://cambridge.oc2.uk/a/3v4sf>

Our ref: MLP/[REDACTED]
Your ref:

22 November 2021

Greater Cambridge Shared Planning Policy Team,
South Cambridgeshire District Council,
Cambourne Business Park,
Cambourne,
Cambridge,
CB23 6EA



St Neots Office

The Fairways
Wyboston Lakes
Great North Road
Wyboston
Bedfordshire
MK44 3AL

E [REDACTED]
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W brown-co.com

EMAIL ONLY

Dear Sir/Madam,

GAMLINGAY NEIGHBOURHOOD PLAN REGULATION 16 CONSULTATION

We are instructed to submit the following representations on behalf of [REDACTED]. [REDACTED] is a major landowner around Gamlingay and over the years it has actively assisted the local community in realising benefits, such as the sale of Gamlingay Wood to the Wildlife Trust that provides public access and the provision of land for new open space and footpath links around the village.

[REDACTED] welcomes and supports the village in influencing future development shaped through the proposed Neighbourhood Plan and the College hopes that it can continue to work with the local community in realising its future aspirations.

The College has previously contributed to the preparation of the Neighbourhood Plan at various stages, including the Regulation 14 consultation. This does raise a procedural point that despite the earlier involvement, no formal notification was received from the South Cambridgeshire District Council of the latest consultation exercise and it was purely by luck that we became aware of this. This gives rise to the question whether all parties who have previously commented on the emerging plan have been consulted?

Although several matters previously raised by the College have been addressed in the Regulation 16 document, the College wishes to raise the following issues that require further explanation and/or consideration:

Page	Para.	
11	1.8	The paragraph states ' <i>Once the Plan has secured the consent of local people via a referendum, the community will be in a position to benefit from 25% of the Community Infrastructure Levy (CIL)....</i> ' It is highlighted that any benefit is firstly dependent on the South Cambridgeshire District Council adopting a Community Infrastructure Levy and this is by no means certain. Secondly, the ability to realise CIL proceeds is reliant on new additional development permissions coming forward after the CIL is introduced. Given the Neighbourhood Plan does not allocate new housing development, and this concludes the village has already exceeded its quota of new windfall housing for the period to 2031 (Para 4.10), it is questionable whether and what level of CIL receipts could be realised. Although new employment development is encouraged, this may not attract any CIL receipt. Therefore, the statement of benefiting from CIL proceeds may be construed as misleading.

21 2.13 States “*Land at North, South and East of Tempsford (6 miles away from Gamlingay) has been safeguarded in the Central Bedfordshire Local Plan for future development, to be assessed further in the Partial Plan Review to consider the potential capacity for 10,000+ homes*”. However, it is highlighted that the corridor option designation was removed in the Central Bedfordshire Local Plan 2015 - 2035 document adopted in July 2021.

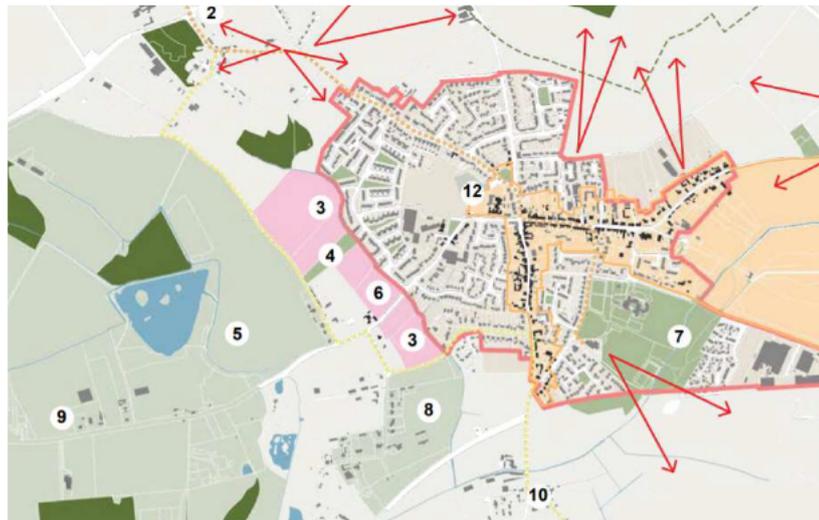
40 4.24 Policy GAM1 – New buildings and employment buildings states “*New housing developments (including applications made for a single property at a time) will.....provide a mix of homes, in particular one or two-bedroom dwellings and bungalows*”. We must query the justification for this policy bearing in mind that 47% of those who responded to the Housing Needs Survey questionnaire (Q17) expressed a desire for 3+ bedroom accommodation.

Additionally, given the Neighbourhood Plan does not allocate new housing development and concludes the village has already exceeded its quota of new windfall housing for the period to 2031 (Para 4.10), and that planning permission already exists for the Green End Industrial Estate site and West Road allocations, it is questionable whether more affordable 1 or 2-bedroom dwellings or bungalows can be expected to come forward in the plan period?

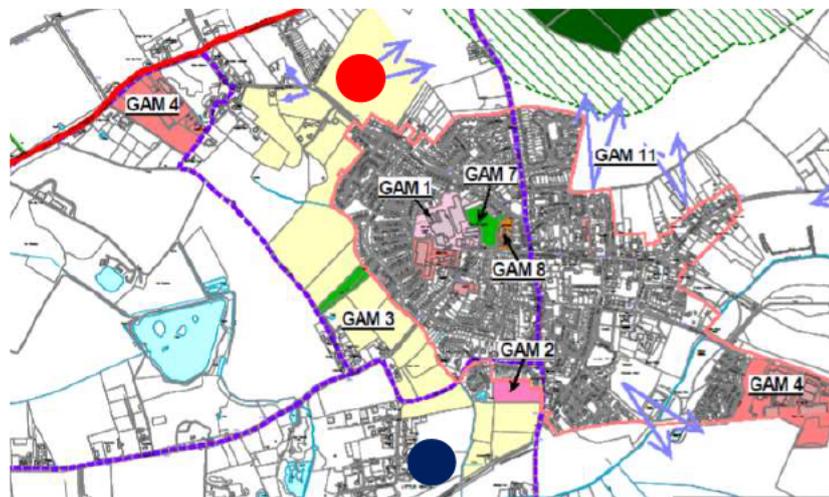
The policy states applications made for a single property at a time will be expected to provide a mix of homes, in particular one or two-bedroom dwellings. However, how can a planning application for a single dwelling include such a mix?

The Policy states new housing developments include “*dwellings that exceed the baseline policy requirements for environmental sustainability set out in the Local Plan. In order to respond to the Climate Emergency all new housing should be insulated to Energy Performance Certificate rating A*”. Whilst supporting these ‘green’ initiatives, it is highlighted this will have financial consequences and potentially impact on the viability of developments and there is no evidence that the financial consequences been fully evaluated and considered. The additional cost could also conflict with the parish aspiration for smaller more affordable housing (para 4.22).

43 4.32 It is stated the “*The Village Design Guide identified a ‘sensitive village edge’ bounded by the brook and Great Heath and including the Lupin Field and Log Field to the south west of the village. It also advised maintaining the integrity of the hamlets, in particular the separation of The Cinques and Little Heath, by retaining the open landscape character between these and the village. This ‘settlement gap’ between the village, The Cinques, Dennis Green and Little Heath is coloured yellow on Map 4 showing landscape setting and Map 7 the policy areas*”. The inference is that the yellow shaded areas on the Key Policy Areas Map and maps 2, 4 and 5A are derived from Village Design Guide SPD, which has not been subject to examination. However, it is highlighted the Neighbourhood Plan includes additional ‘sensitive village edge’ areas not included in the Village Design Guide, as seen in the extracts below.



Extract from the Village Design Guide SPD with the 'sensitive village edge' areas shaded pink.



Extract from the consultation Plan with the 'sensitive village edge' areas shaded yellow.

The consultation plan document provides no explanation for the identification of the yellow character areas in terms of their particular significance and qualities, how they were selected and their specific justification. For example, why is the field identified with the red dot above selected, yet the field identified by the blue dot (which has more significance to the Little Heath separation) is not?

Noting that some of the 'sensitive village edge' areas are incorporated within the Village Design Guide SPD, it is pointed out representations were submitted in respect of the Village Design Guide querying the criteria against which these were assessed. This query was not addressed by the South Cambridgeshire Council when the Design Guide was adopted and having subsequently raised this it has been highlighted by the District Council that the Design Guide "is a supplementary planning document and not a development plan document". The explanation highlights that the Neighbourhood Plan, which will be a development plan, should explain the criteria for the selection of the 'sensitive village edge' areas, and how these have been objectively assessed.

Within the Plan there is ambiguity whether the yellow areas are 'sensitive village edge' areas (as referred to in paras 4.28 & 4.32 and the key to the maps) or a 'settlement gap' (paras 4.32, 4.33, 4.35 and GAM3). What is it? Policy GAM3 states "Housing will be located within the boundary of Gamlingay village (its development framework) to prevent the village, the hamlets and smallholdings from joining up, to preserve the

visual quality of the landscape and retain the separate identities of the settlements. Particular emphasis is placed on the settlement gap between Cinques, Dennis Green and Little Heath identified in the Policies Map". Considering the explanation surely the 'gap' should embrace all the land between the village, and The Cinques, Dennis Green and Little Heath, and not just some of the fields on the edge of the village?

Acknowledging the aim to protect the countryside, it is pointed out there is already adequate policy protection in place through the adopted Local Plan due to:

- Policy S/7: Development Frameworks clarifies that outside of development frameworks, only allocations within Neighbourhood Plans and development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside or where supported by other policies in the plan will be permitted.
- Policy NH/2: Protecting and Enhancing Landscape Character requires development to respect, retain or enhance the character and distinctiveness of the local landscapes and national character areas;
- NH/3: Protecting Agricultural Land clarifies planning permission will not be granted for development which would lead to the irreversible loss of Grades 1, 2 or 3a agricultural land;
- Policy NH/13: Important Countryside Frontage identifies important countryside frontages and states that planning permission for development will be refused if it would compromise important countryside frontages;
- Policy NH/14 Heritage Assets supports development that will enhance and sustain heritage assets such as buildings, monuments, sites, places, areas or landscapes which are significant because of their historic interest.

Considering the advice that neighbourhood plans should not repeat policies of the Local Plan and the policy measures that are already in place to protect the open countryside from harmful development, there is no justification or necessity for the designation of the 'sensitive village edge' character areas.

- | | | |
|----|------|---|
| 59 | 4.77 | Refers to the fact the Parish Council have " <i>commissioned Sustrans to assess the feasibility of a shared use cycle route between Gamlingay and Potton – the Cycle and Footway Improvement Plan (CFIP) (2019)</i> ". However, this plan has no formal status and surprisingly the delivery of the cycle and footway improvements do not form a specific objective or policy within the Neighbourhood Plan. As a result, the Cycle and Footway Improvement Plan has no formal policy delivery strategy. |
| 61 | 4.81 | Policy GAM9 – Transport provision on developments states ' <i>...new housing will be located within convenient walking or cycling distance to village facilities. All developments (including employment sites) should provide new pavements and shared use paths/cycleways where there is poor or no existing provision...</i> ' It is considered the Policy is ambiguous and this should clarify when and how a path/cycleway is 'poor' and whether the required improvement will be limited to the site frontage or more distant connections and to what destinations? This should also be proportionate to the needs and demands of the particular development. For example, a single new dwelling will be unlikely to have a material impact on footway or cycleway needs or what if improvements are not achievable within the available public highway, or these would have a harmful impact on heritage assets? |

The policy states “*Housing developments are expected to provide enough car parking for residents and visitors within the development envelope*”. What level of parking provision is intended? Considering the advice that neighbourhood plans should not repeat policies of the Local Plan it is highlighted Local Plan Policy TI/3 already requires car parking provision should be provided through a design-led approach in accordance with the indicative standards set out in the Local Plan. Regarding the parking element of Policy GAM9 this is considered unnecessary, unless the Neighbourhood Plan is seeking a different level of parking provision?

- 62 4.82 Policy GAM10 – requires “*New residential and business units are expected to help mitigate their impact on the local road network by contributing £21 per m2 of floor space (for business developments), and £10 per m2 of floor space (for housing developments) towards the provision and maintenance of new paths (see Map 10) for the purpose of cycling, walking and horse riding between the village, hamlets, employment sites and neighbouring villages*”. However, as already noted, there is no specific policy strategy within the consultation Neighbourhood Plan in respect of securing the provision and maintenance of new paths for the purpose of cycling, walking and horse riding between the village, hamlets, employment sites and neighbouring villages. Whilst acknowledging the Sustrans Gamlingay Cycleway Improvement Plan, it is highlighted this did not address horse riding routes and the greater part of the proposed improvements in fact lie within the Central Bedfordshire authority and the parish of Potton to the south of Gamlingay.

It is highlighted that in response to the previous draft document SCDC noted ‘*The Gamlingay Cycle and Footway Improvement Plan states It is estimated that the construction costs for the path alone will be at least £1M. This excludes land acquisition costs and any bridge works. However only part (around half) of the cycle route is within Gamlingay. To justify the level of contribution sought it may be necessary to understand the cost associated with the part of the route that is within Gamlingay Parish Council boundary. (BC test) (para 117)*. This is not considered to have been addressed.

Section 122 of the Community Infrastructure Levy Regulations 2010 clarifies that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

Additionally, the National Planning Guidance is clear that planning obligations can only be required to mitigate the impact of unacceptable development that will make it acceptable in planning terms (Paragraph: 002 Reference ID: 23b-002-20190901). It is clearly the case that for example a development on one side of the village cannot reasonably be directly related to providing a horse-riding route on the other side of the village. Also providing a horse-riding route will not reasonably be necessary or the difference between an acceptable and unacceptable development. Consequently, Policy GAM10 is not in accordance with the Community Infrastructure Levy Regulations 2010.

Paragraph: 011 Reference ID: 23b-011-20190315 of the National Planning Guidance also clarifies “*Plans should be informed by evidence of infrastructure and affordable housing, and a proportionate assessment of viability that takes into account all relevant*

policies". Reviewing the consultation plan and supporting documents there is no evidence that the required assessment of viability has been undertaken.

The National Planning Policy Guidance further clarifies plan makers should ensure that policy requirements for contributions from development are deliverable. The Sustrans Gamlingay Cycleway Improvement Plan identifies the construction cost of the proposed improvements would be at least £1M just for the path itself, excluding land acquisition costs. Bearing in mind the routes identified on the Map 10 Walking Cycling and Horse-Riding Routes include additional schemes not identified in the Sustrans Plan, the costs will clearly be even greater. Considering the Neighbourhood Plan does not allocate new housing development, and this concludes the village has already exceeded its quota of new windfall housing for the period to 2031 (Para 4.10), and that planning permission already exists for the Green End Industrial Estate and West Road allocations, the reality is the very restricted further future development scope can be expected to deliver only limited funding. For example, if 10 further properties were to come forward in the plan period this could potentially deliver £29,410 using the Parish Council's methodology with an average household size of 100 m². This will be likely to cover no more than the engineering design costs for the improvements and will not realise a sufficient fund to enable the improvements to be delivered. Regardless of funding, there is also no certainty the improvements are deliverable as these are dependent on securing the necessary land.

In the response to the previous draft document, it is highlighted SCDC noted "*Policy GAM10 requires contributions of £21 per m² of floor space (for business developments), and £10 per m² of floor space (for housing developments). We would suggest the plan should seek to explain how these contributions have been arrived at and also estimate the likely level of contribution that may be secured over a period of time (say 10 years) in order to provide some certainty that the scheme will be delivered. If the estimated level of contributions are unlikely to be paid for by new developments alone then we would suggest the plan should set out potential alternative funding schemes that may be available in order to achieve its delivery. (BC test)*" (para 118). This is not considered to have been addressed.

- 67 4.95 States "New development should not obstruct or harm the special views and vistas identified by the Village Design Guide". However, as previously noted, the Design Guide is a supplementary planning document and not a development plan document, and this has not been subject to examination. Additionally, the Design Guide provides no explanation for the identification of the views or vistas in terms of their special qualities or how these were assessed against any objectively assessed criteria. This was highlighted during the Village Design Guide consultation, but no explanation or consideration of the objection was provided by the District Council.
- 67 4.96 Policy GAM11 – Landscape and natural environment requires that developers deliver "*measurable, proportionate and appropriate biodiversity net gains (in line with national policy.....*". Given the provisions within the Environmental Act and the acknowledgement the policy is in line with national policy, the first paragraph of policy GAM11 is unnecessary.

As regards the second paragraph of Policy GAM11 that housing and employment developments must not obstruct or otherwise harm protected views and vistas, we have

highlighted the absence of any objectively assessed criteria for the views identified in the Village Design Guide SPD.

Whilst acknowledging the supporting Landscape and Visual Analysis document commissioned by the Parish Council, it is noted there is inconsistency with some views assessed in the Landscape and Visual Analysis document but not being included in the consultation Neighbourhood Plan, whilst other views not assessed in the supporting Landscape and Visual Analysis document are included in the consultation Neighbourhood Plan. Overall, this highlights an apparent absence of any clearly stated objective criteria for preparing the plan. For example, the consultation plan includes a view from Church End towards Gamlingay Wood, however this view does not exist, and the Landscape and Visual Analysis document assesses the view towards the Gamlingay Wood from the public footpath that lies to the north.



Following from the above it is highlighted there is inconsistency between the views identified in the Policy Areas Map and those listed in Appendix 2, with the following examples missing from the maps:

- Gamlingay Wood south west to Cinques Rd;
- Gamlingay Wood to Grays Rd;
- Gamlingay Wood to Dutter End/Church End

For consistency and clarity the maps should reflect the Appendix 2 views and vistas.

67 4.97 Policy GAM12 – Gamlingay Wood states “Development will usually not be permitted within a 200m cordon from the edge of Gamlingay Wood Site of Special Scientific Interest.....” It is highlighted the consultation plan contains no justification or evidence to substantiate the need specifically for a 200m cordon.

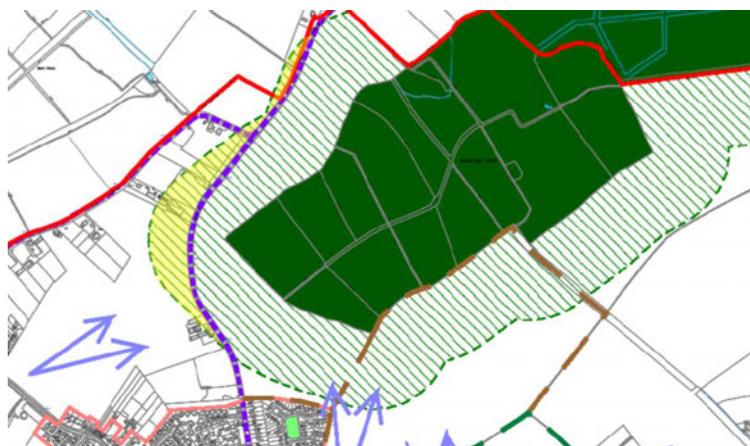
It is understood the 200m cordon has emerged from engagement with the Wildlife Trust and the conclusion of the Neighbourhood Steering group that any development closer than the existing village development framework would be detrimental for biodiversity

and impact on the wood by increased footfall, and the importance to retain landscape views/vistas. We must highlight the footfall justification is at odds with the aspiration to create a cycleway link to Waresely, identified on Map 10, that will improve pedestrian accessibility in the vicinity of Gamlingay Wood.

It is further understood the 200m cordon was chosen because the closest housing is currently just over 200m away, although as highlighted below this is in fact not the case. To ensure the soundness of the Plan the 200m cordon needs to be justified in terms of its nature conservation significance or value and why/how development within the proposed cordon would be detrimental for biodiversity and unacceptably impact on the wood. The Plan should also explain why the existing Local Plan countryside protection polices identified above are considered inadequate.

It is noted that in response to the previous draft document SCDC noted *“The 200m cordon we understand is to allow for countryside uses for those using the woodland. This should be explained more clearly in the supporting text rather than simply stating it is for the enjoyment of future generations but then mentioning in the policy that it is to allow for small scale sustainable construction for the traditional woodland industry. This needs to be explained. (BC test)”* (para 125). This is not considered to have been addressed.

The arbitrary nature of the 200m cordon is reflected in the fact this includes land physically separated from the Gamlingay Wood by the B1040 and existing built development within 200m, as shaded yellow below.



74

Appendix 3: Developer contributions aims to provide clarity for the infrastructure costs and contributions sought through policy GAM10, however, this is inadequate in the following respects:

- It is stated that providing the 12.5km of new cycleway is costed at £5 million **excluding land costs**. However, the greater part of the proposed improvements in fact lies within Central Bedfordshire, a different local authority to the south of Gamlingay and it would be unreasonable to require development in Gamlingay to fund improvements in a different authority;
- The explanation pro ratas the costs over the Gamlingay housing stock number, however it does not acknowledge the element of works within the adjoining parish of Potton and the housing stock in that settlement. This has the consequence of inflating the cost in the methodology used by the Parish Council;

- The explanation does not address how the £21 per m² for new employment development has been arrived at. This could put a significant barrier in the way of delivering new business growth.
- There is no evidence that the required assessment of viability has been undertaken.
- It is inescapable that the delivery of the improvements is very unlikely given the limited quantum of new development that could be required to make contributions.

For the above reasons proposed policy GAM 10 is not justified or sound, and it does not comply with the Community Infrastructure Levy Regulations 2010 nor national planning guidance.

It is highlighted that financial contributions sought through policy GAM10 will have to be secured through a S106 agreement between the Parish Council and the applicant/developer, adding costs and delay to the development process. To address this the Plan proposes a standardised template legal agreement for individual/small scale property development, like the one in use by Huntingdonshire District Council. However, we highlight the Huntingdonshire Unilateral Undertaking arrangement is only used by the authority to address the provision of wheeled bins and this does not address financial payments for infrastructure improvements. The National Planning Guidance (Paragraph: 021 Reference ID: 23b-021-20190315) clarifies *“Local planning authorities are expected to use all of the funding received by way of planning obligations, as set out in individual agreements, in order to make development acceptable in planning terms. Agreements should normally include clauses stating when and how the funds will be used by and allow for their return, after an agreed period of time, where they are not”*. To enable this developers will expect the Parish Council to enter an obligation that will commit it to spend the money appropriately and to refund any unspent money, which can only be secured through a formal much more costly and protracted S106 agreement.

Conclusions

For the reasons explained above it is considered the plan as currently drafted does not meet the basic conditions of being compliant with national policies and advice, and elements are not in conformity with the adopted development plan. Overall, this will frustrate the delivery of potentially sustainable developments and revisions to address the above points are necessary.

We would be grateful to receive an acknowledgement in respect of the above representation and to be kept advised on the consideration of our points and the progress of the Neighbourhood Plan.

Yours faithfully

[Redacted Signature]

MA [Redacted]
For and on behalf of Brown & Co - Property and Business Consultants LLP
t/a Brown & Co Barfords

Mob: [Redacted]
DDI: [Redacted]

Gamlingay Neighbourhood Plan



Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or

neighbourhood.planning@greatercambridgeplanning.org

All comments **must** be received by 5pm on Tuesday 23 November 2021.

Data Protection

We will treat your data in accordance with our Privacy Notices:

www.scams.gov.uk/planning-policy-privacy-notice/. Information will be used by South Cambridgeshire District Council solely in relation to the Gamlingay Neighbourhood Plan.

Please note that all responses will be available for public inspection and cannot be treated as confidential. Representations, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed of future stages of the Gamlingay Neighbourhood Plan?

Please tick: Yes No

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:	██████████	Agent's name:	Martin Page
Name of organisation: (if applicable)	██████████ & ██████████ ██████████	Name of Agent's organisation: (if applicable)	Brown & Co Barfords
Address:	██████████ ██████████	Agent's Address:	The Fairways Wyboston Lakes Great North Road Wyboston Bedfordshire
Postcode:	██████████	Postcode:	MK44 3AL
Email:		Email:	██████████ ██████████
Telephone:		Telephone:	██████████
Signature:		Date:	22.11.21

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representation number:

Part B – Your Response**What part of the Neighbourhood Plan do you have comments on?**

Policy or Paragraph Number (please state)	Paragraphs 1.8, 2.13, 4.24, 4.32, 4.77, 4.81, 4.82, 4.95, 4.96, 4.97 and Appendix 3
Do you Support, Object or have Comments? (Please tick)	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Object <input checked="" 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.

Refer to accompanying representation letter.

Summary of Comments:

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

It is considered the plan as currently drafted does not meet the basic conditions of being compliant with national policies and advice, and elements are not in conformity with the adopted development plan. Overall, this will frustrate the delivery of potentially sustainable developments and revisions to address the above points are necessary.

As explained in the accompanying representation letter the particular issues relate to paragraphs 1.8, 2.13, 4.24, 4.32, 4.77, 4.81, 4.82, 4.95, 4.96, 4.97 and Appendix 3.

Completed forms must be received by 5pm on 23 November 2021 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
 Cambourne Business Park, Cambourne,
 Cambridge, CB23 6EA

56589

Support

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** O'Donovan Holdings Ltd**Agent:** Icen Projects Limited**Date received:** 23/11/2021 via Email**Summary:****Comment**

We propose the site Land at Potton Road, Mill Hill, Gamlingay as a further housing allocation (for sustainable affordable housing). The Plan currently has no allocations for affordable housing, this site would provide one. The site is previously-developed land in an accessible location. Development on the site would meet the unmet need for affordable housing locally and also support local facilities.

The recent Housing Needs Survey (2021) supports the need for a further housing allocation, finding that every year for the next 5-years a minimum of 27 households will be in affordable housing need, 135 households over 5-years.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4sg>
Representation - <https://cambridge.oc2.uk/a/3v4tr>

56590

Support

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** O'Donovan Holdings Ltd**Agent:** Icen Projects Limited**Summary:**

Objective 1 - We support this objective because there is a clear need for sustainable affordable homes, in particular 1-2-bedroom dwellings and bungalows.

Objective 4 - We support this objective in line with the requirement in the NPPF (2021) at para. 79 for housing in rural areas to be located where it will enhance or maintain the vitality of rural communities.

Policy GAM1 - We support this draft policy, specifically the requirement for housing development to "provide a mix of homes, in particular one- or two-bedroom dwellings and bungalows."

Policy GAM6 – We support the protection of community amenities and facilities.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4sh>Representation - <https://cambridge.oc2.uk/a/3v4ts>

56591

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: O'Donovan Holdings Ltd

Agent: Icen Projects Limited

Date received: 23/11/2021 via Email

Summary:

Objective 2 - This objective should include support for rural exception sites to meet a sustainable affordable housing need, as long as they are well-designed.

Objective 5 - The objective therefore should not be to encourage more parking provision, but rather to provide levels of parking appropriate to the site and circumstances.

Paragraphs 4.23, 4.31, text box on page 43 and Policies GAM3 and GAM9 - These state that the right place for new homes is within the village boundary. We object to this because there is no reference to rural exception sites. These are permitted according to South Cambridgeshire Local Plan Policy H/11, so the text should be amended to reflect this.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4sx>

Representation - <https://cambridge.oc2.uk/a/3v4tt>



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Friday, 19 November 2021

BY email to:
neighbourhood.planning@greatercambridgeplanning.org

Dear Sir/Madam,

GAMLINGAY NEIGHBOURHOOD PLAN SUBMISSION – AUGUST 2021

On behalf of our client [REDACTED], we provide our comments below on the submission version of the Gamlingay Neighbourhood Plan.

Vision and Objectives

Objective 1: We will meet the needs of the local community by supporting new housing that is of appropriate size, affordable and adaptable. All new buildings will be built to high environmental standards.

We support this objective. As set out later in the plan, there is a clear need for sustainable affordable homes, in particular 1-2-bedroom dwellings and bungalows.

A further Housing Needs Survey was carried out in September and October 2021. Snapshot data from the survey and housing register is turned into an annual flow of households in affordable using the Government's Basic Needs Assessment Model. The main findings of the model are that:

- every year for the next 5-years a minimum of 27 households will be in affordable housing need, 135 households over 5-years;
- 55% will seek affordable rented housing and 45% will seek affordable home ownership; and
- a mixture of 1, 2 and 3 bedroom bungalows semi detached and terraced houses are needed.

Objective 2: In order to maintain the integrity of Gamlingay as a radial village with satellite hamlets and smallholdings, we will protect the open countryside and landscape setting. We will protect our built heritage. Alterations to existing buildings and new buildings will reflect and contribute to the strong character of the built heritage expressed in the Village Design Guide.

This objective should include support for rural exception sites to meet an affordable housing need, as long as they are well-designed. Rural exception sites are supported in the South Cambridgeshire

Local Plan (2018) at Policy H/11 permits rural exception sites on small sites at locations within or adjacent to existing settlements.

Objective 4: We will protect valued local amenities and seek developer contributions to ensure that local facilities adapt to meet the needs of our growing community.

We support this objective. The NPPF (2021) at para. 79 states that:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

Objective 5: We will develop a network of paths to promote walking, cycling and riding for everyday journeys and recreation. We will reduce congestion by encouraging more parking provision.

We support the promotion of walking, cycling and riding. However with regard to car parking, the policy should be in line with South Cambridgeshire Local Plan Policy TI/3: Parking Provision which states that:

“Car parking provision will take into consideration the site location, type and mix of uses, car ownership levels, availability of local services, facilities and public transport, and highway and user safety issues, as well as ensuring appropriate parking for people with impaired mobility.”

The objective therefore should not be to encourage more parking provision, but rather to provide levels of parking appropriate to the site and circumstances.

Paragraph 4.23

This paragraph states that housing sites must fall within the development framework.

We object to this because there is no reference to rural exception sites. These are permitted according to South Cambridgeshire Local Plan Policy H/11, so the text should be amended to reflect this.

Policy GAM1 – New houses and employment buildings

We support this draft policy, specifically the requirement for housing development to “provide a mix of homes, in particular one- or two-bedroom dwellings and bungalows.”

Housing surveys have shown a clear need for 1-2 bedroom properties and bungalows and affordable bungalows according to Table 3 of the Plan have not been delivered.

As stated in paras. 4.12 and 4.13 of the Plan, the Housing Needs Survey (2018) indicates a particular demand for smaller 1-2-bedroom homes and bungalows in order to meet the needs of single people requiring accommodation on their own, as well as older people seeking to downsize. Market conditions showed a glut of larger 4- and 5-bedroom houses for sale in the parish, with only one 2-bedroom property available in December 2017.

A further Housing Needs Survey was carried out in September and October 2021. Snapshot data from the survey and housing register is turned into an annual flow of households in affordable using the Government's Basic Needs Assessment Model. The main findings of the model are that:

- every year for the next 5-years a minimum of 27 households will be in affordable housing need, 135 households over 5-years;
- 55% will seek affordable rented housing and 45% will seek affordable home ownership; and
- a mixture of 1, 2 and 3 bedroom bungalows semi detached and terraced houses are needed.

Further information on this survey is provided under the heading 'Proposed site allocation' below.

Page 43

The text box on page 43 states that the right place for new homes is within the boundary of the village.

We object to this because there is no reference to rural exception sites. These are permitted according to South Cambridgeshire Local Plan Policy H/11, so the text should be amended to reflect this.

Paragraph 4.31

This paragraph states that new homes should be within the boundary of the village.

We object to this because there is no reference to rural exception sites. These are permitted according to South Cambridgeshire Local Plan Policy H/11, so the text should be amended to reflect this.

Policy GAM3 – Local character

The draft policy states that:

“Housing will be located within the boundary of Gamlingay village (its development framework) to prevent the village, the hamlets and smallholdings from joining up, to preserve the visual quality of the landscape and retain the separate identities of the settlements.”

We object to this policy because there is no reference to rural exception sites. These are permitted according to South Cambridgeshire Local Plan Policy H/11, so the policy should be amended to reflect this.

Policy GAM6 – Community amenities and facilities

We support the protection of community amenities and facilities.

Policy GAM9 – Transport provision on developments

The draft policy states that “Situating within the village framework, new housing will be located within convenient walking or cycling distance to village facilities”.

We object to this policy – the policy should be amended to refer to rural exception sites and should also refer to locations within easy reach of a bus stop.

Proposed site allocation

We propose the site Land at Potton Road, Mill Hill, Gamlingay as a further housing allocation (for sustainable affordable homes). A map is included at Appendix 1.

A Housing Needs Survey was carried out in September and October 2021. All households in the parish were invited to respond to the questionnaire. 1,676 questionnaires were dispatched and 204 responses were received. Survey data was processed to find out how many households were in affordable housing need and planned to move home to find more suitable housing that they could afford in the parish. The number of new households likely to form and be in affordable need over the next 5-years was also estimated from information provided by respondents. Information was collected about number of bedrooms needed and household preferences for affordable rented or affordable home ownership (e.g. shared ownership).

The Government's good practice guidance for housing needs surveys states that more than one source of data should be used to estimate levels of affordable housing need. This is because parish housing surveys cannot collect information from households with a local connection that do not live in the parish and not all households respond to the survey. Housing registers underestimate need as registration is voluntary, only records need for affordable rented housing and does not take account of future need from newly forming households. Therefore both methods tend to undercount local need for affordable housing.

Snapshot data from the survey and housing register is turned into an annual flow of households in affordable using the Government's Basic Needs Assessment Model. The main findings of the model are that:

- every year for the next 5-years a minimum of 27 households will be in affordable housing need, 135 households over 5-years;
- 55% will seek affordable rented housing and 45% will seek affordable home ownership; and
- a mixture of 1, 2 and 3 bedroom bungalows semi detached and terraced houses are needed.

Supply from vacancies and new build affordable homes must be taken into account over this 5-year period. We note that 34 affordable homes including 10 shared ownership homes will be built in the parish on the former Green End industrial estate over the next few years.

Our overall finding is that even taking supply into account there will still be a need for 15 affordable rented and 49 affordable home ownership dwellings over the 5-year period.

This level of need is mostly due to the level of local house prices. The HNS demonstrates that although prices are lower than for South Cambridgeshire as a whole, they are still not affordable to many households needing to move to more suitable housing.

We also had responses from home owners seeking more suitable housing at market prices. Many are seeking to upsize to 4-bedroom homes. We note that Gamlingay has a smaller proportion of 4-bedroom homes than South Cambridgeshire as a whole.

The proposed site at Land at Potton Road falls outside the Gamlingay settlement boundary, however as it is previously developed land (a former scrap yard) it is sequentially preferable to many alternative greenfield locations. In addition, the site has an extant consent for B class employment uses. If this was implemented, the site could be in commercial use and there would be workers commuting to and from the site, and at lunchtimes (as there are no facilities currently on the site).

The NPPF (paragraphs 122 and 130) encourages the effective use of land by reusing land that has been previously developed provided that it is not of high environmental value. The site is not considered to be of high environmental value (as it is not within the Green Belt, nor are there any other protected designations) and therefore the re-development of the site would be in line with this key aim.

The Council's leaflet on rural exception sites states that these can only be brought forward if there is a proven unmet local need for affordable housing. The Housing Needs Survey results demonstrate that there is a proven unmet local need for affordable housing. The Neighbourhood Plan Submission does not include any affordable housing sites.

A sustainable affordable housing development on this site would support local shops and services in Gamlingay, and also in nearby Potton, in accordance with the NPPF paragraph 79 which states that housing should be located where it will enhance or maintain the vitality of rural communities, as well as the Neighbourhood Plan Draft Objective 4 which seeks to support local facilities. There is a farm shop and café opposite the site and therefore the site is in close proximity to local facilities. Furthermore, on-site facilities could be included in any development.

Transport options for the site include an eco-friendly shuttle bus between the site and the village, a contribution towards local bus services or a car rental scheme, a bike hire scheme and electric vehicle charging points.

Summary

Please take these representations into account. Should you have any queries then please do contact me on tel. [REDACTED] or [REDACTED], alternatively my colleague Simran Kang will be happy to assist [REDACTED] or [REDACTED]).

Yours faithfully,

Gemma Jenkinson

BSc (Hons) MSc MRTPI
Director of the Midlands, Planning

APPENDIX 1



Gamlingay Neighbourhood Plan



Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or

neighbourhood.planning@greatercambridgeplanning.org

All comments **must** be received by 5pm on Tuesday 23 November 2021.

Data Protection

We will treat your data in accordance with our Privacy Notices:

www.scambs.gov.uk/planning-policy-privacy-notice/. Information will be used by South Cambridgeshire District Council solely in relation to the Gamlingay Neighbourhood Plan. Please note that all responses will be available for public inspection and cannot be treated as confidential. Representations, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed of future stages of the Gamlingay Neighbourhood Plan?

Please tick: Yes X No

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:		Agent's name:	Gemma Jenkinson
Name of organisation: (if applicable)	██████████ ██████████	Name of Agent's organisation: (if applicable)	Iceni Projects Ltd
Address:	C/O Agent	Agent's Address:	The Colmore Building 20 Colmore Circus Queensway Birmingham
Postcode:		Postcode:	B4 6AT
Email:		Email:	██
Telephone:		Telephone:	██████████
Signature:	G Jenkinson	Date:	05/11/21

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representat on number:

Part B – Your Response**What part of the Neighbourhood Plan do you have comments on?**

Policy or Paragraph Number (please state)	Whole Plan
Do you Support, Object or have Comments? (Please tick)	Support Object X 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.

We propose the site Land at Potton Road, Mill Hill, Gamlingay as a further housing allocation (for affordable housing). A map is included with the accompanying letter.

A Housing Needs Survey was carried out in September and October 2021. All households in the parish were invited to respond to the questionnaire. 1,676 questionnaires were dispatched and 204 responses were received. Survey data was processed to find out how many households were in affordable housing need and planned to move home to find more suitable housing that they could afford in the parish. The number of new households likely to form and be in affordable need over the next 5-years was also estimated from information provided by respondents. Information was collected about number of bedrooms needed and household preferences for affordable rented or affordable home ownership (e.g. shared ownership).

The Government's good practice guidance for housing needs surveys states that more than one source of data should be used to estimate levels of affordable housing need. This is because parish housing surveys cannot collect information from households with a local connection that do not live in the parish and not all households respond to the survey. Housing registers underestimate need as registration is voluntary, only records need for affordable rented housing and does not take account of future need from newly forming households. Therefore both methods tend to undercount local need for affordable housing.

Snapshot data from the survey and housing register is turned into an annual flow of households in affordable using the Government's Basic Needs Assessment Model. The main findings of the model are that:

- every year for the next 5-years a minimum of 27 households will be in affordable housing need, 135 households over 5-years;
- 55% will seek affordable rented housing and 45% will seek affordable home ownership; and
- a mixture of 1, 2 and 3 bedroom bungalows semi detached and terraced houses are needed.

Supply from vacancies and new build affordable homes must be taken into account over this 5-year period. We note that 34 affordable homes including 10 shared ownership homes will be built in the parish on the former Green End industrial estate over the next few years.

Our overall finding is that even taking supply into account there will still be a need for 15 affordable rented and 49 affordable home ownership dwellings over the 5-year period.

This level of need is mostly due to the level of local house prices. The HNS demonstrates that although prices are lower than for South Cambridgeshire as a whole, they are still not affordable to many households needing to move to more suitable housing.

We also had responses from home owners seeking more suitable housing at market prices. Many are seeking to upsize to 4-bedroom homes. We note that Gamlingay has a smaller proportion of 4-bedroom homes than South Cambridgeshire as a whole. This site falls outside the Gamlingay settlement boundary, however as it is previously developed land (a former scrap yard) it is sequentially preferable to many alternative greenfield locations. In addition, the site has an extant consent for B class employment uses. If this was implemented, the site could be in commercial use and there would be workers commuting to and from the site, and at lunchtimes (as there are no facilities currently on the site).

The NPPF (paragraphs 122 and 130) encourages the effective use of land by reusing land that has been previously developed provided that it is not of high environmental value. The site is not considered to be of high environmental value (as it is not within the Green Belt, nor are there any other protected designations) and therefore the re-development of the site would be in line with this key aim.

The Council's leaflet on rural exception sites states that these can only be brought forward if there is a proven unmet local need for affordable housing. The Housing Needs Survey results demonstrate that there is a proven unmet local need for affordable housing. The Neighbourhood Plan Submission does not include any affordable housing sites.

Sustainable affordable homes on this site would help to support local shops and services in Gamlingay, and also in nearby Potton, in accordance with the NPPF paragraph 79 which states that housing should be located where it will enhance or maintain the vitality of rural communities, as well as the Neighbourhood Plan Draft Objective 4 which seeks to support local facilities. There is a farm shop and café opposite the site and therefore the site is in close proximity to local facilities. Furthermore, on-site facilities could be included in any development.

Transport options for the site include an eco-friendly shuttle bus between the site and the village, a contribution towards local bus services or a car rental scheme, a bike hire scheme and electric vehicle charging points.

Summary of Comments:

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

We propose the site Land at Potton Road, Mill Hill, Gamlingay as a further housing allocation (for sustainable affordable housing). The Plan currently has no allocations for affordable housing, this site would provide one. The site is previously-developed land in an accessible location. Development on the site would meet the unmet need for affordable housing locally and also support local facilities.

The recent Housing Needs Survey (2021) supports the need for a further housing allocation, finding that every year for the next 5-years a minimum of 27 households will be in affordable housing need, 135 households over 5-years.

Completed forms must be received by 5pm on 23 November 2021 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
Cambourne Business Park, Cambourne,
Cambridge, CB23 6EA

56592

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: South Cambridgeshire District Council

Date received: 23/11/2021 via Email

Summary:

Policies Map and Maps

Concerns about clarity of maps.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56593

Support

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: South Cambridgeshire District Council

Date received: 23/11/2021 via Email

Summary:

Map 1

Map 1 shows the neighbourhood area for Gamlingay – we would recommend using a stronger map base that enable readers to find key information. In this instance, because land west of the parish boundary is in Bedfordshire, it might help if parish and district names and the district boundary were illustrated, and the boundaries clearly shown.

A Neighbourhood Plan must be clear about the area that it covers.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56594

Support

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** South Cambridgeshire District Council**Date received:** 23/11/2021 via Email**Summary:**

Map 4

Map 4 shows landscape settings. It would help the future user of the Plan if there were a greater distinction between the green shadings shown on the map. They look somewhat the same. The key refers to 'examples of good design' but does not name these two places or provide any supporting details for why these are examples of good design.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56595

Support

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** South Cambridgeshire District Council**Date received:** 23/11/2021 via Email**Summary:**

Map 6

Map 6 showing Village Amenities –This map is attempting to show much information across the whole parish. By having a parish wide map this has resulted in the village centre, where many of the facilities are located, at a very small scale and it is not possible to define the exact location of those facilities.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56596

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** South Cambridgeshire District Council**Date received:** 23/11/2021 via Email**Summary:**

Chapter 3 - Our vision

With regards to Objective 1, it is not clear how the reference to 'high environmental standards' is defined. For the sake of clarity, it may be better for the Neighbourhood Plan to promote new development that seeks to 'exceed the baseline policy requirements for sustainability set out in section 4 of the Local Plan, supporting the transition to net zero carbon and the move away from fossil fuels.'

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56597

Support

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: South Cambridgeshire District Council

Date received: 23/11/2021 via Email

Summary:

NPPF

In general, there is nothing in the Plan to acknowledge whether it has been prepared in the context of the 2019 NPPF, which would have been current at the time of the Regulation 14 consultation, or the 2021 NPPF which is now current.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56598

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: South Cambridgeshire District Council

Date received: 23/11/2021 via Email

Summary:

Housing Growth

Concerns about the housing needs survey that accompanies the Plan.

Concerns about wording on housing exception sites

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56599

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** South Cambridgeshire District Council**Date received:** 23/11/2021 via Email**Summary:****GAM1 New Buildings**

Policy Bullet 1 - This policy could be more specific about meeting the local housing need for smaller dwellings for youngsters and for downsizing.

Policy Bullet 2 - The Policy is seeking to set standards of insulation that are restricted by the 2015 Ministerial Statement that states that neighbourhood plans should not set local standards. Energy Performance Certificate (EPC) ratings A is regulated by building regulations not planning policy. By including this requirement, the policy would not be taking account of national planning policy and likely to be removed by an examiner.

Policy Bullet 3 - Whilst noting that Objective 1 of your Plan refers to homes being adaptable across the lifetime of the building and that this aim had been included in the 3rd bullet of Policy GAM1 there needs to be evidence for this. It is not clear that a need has been established that more homes than the 5% identified in Policy H/9: Housing Mix in the Local Plan need to meet M4(2) and/or M4(3) of the optional requirements in the Building Regulations have been identified for the area.

Policy Bullet 3 – The reasoning for the requirement for a new development to be fitted with an electric charging point is not set out in the supporting text. Also, there is no information set out as to how this would be applied for flatted developments

Policy Final paragraph The Government introduced national technical standards for housing in 2015. A Written Ministerial Statement explains that neighbourhood plans should not set out any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. In the light of this Statement, we do not consider it appropriate to set the standards for dwellings in this paragraph, although a neighbourhood plan can set requirements for non-residential buildings.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56600

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** South Cambridgeshire District Council**Date received:** 23/11/2021 via Email**Summary:**

GAM2 Site allocation

The policy should state simply that the site at West Road is allocated for housing as identified on Map 7. It does not need to add that it will meet the housing needs requirement provided by SCDC as part of its duty set out in paragraph 67 of NPPF. This explanation should be within the supporting text for the policy. The policy is not referencing the correct paragraph in the latest published NPPF. It should be paragraph 67 rather than paragraph 65.

Paragraph 4.25 – There is a reference to the reserved matters planning application for Land South of West Road. It would be better to mention that, as of 21.10.2021, this reserved matters application (planning ref. S/3868/18/RM) has yet to be determined.

The explanation as to why this site-specific allocation policy has been included in the Plan is incorrect/ misleading. In this instance it is considered that the Parish Council should be allocating this site because the principle of development has been accepted and it safeguards the development should the permission lapse. We have previously suggested the following wording to explain the advantage of having a site allocation in the Plan:

“By allocating sites and meeting the identified housing requirement, the Neighbourhood Plan fully accords with the requirements of Paragraph 14 of the NPPF in meeting the identified housing requirement in full and therefore providing some certainty in determining proposals for new housing should the District Council not be able to demonstrate a five-years supply of housing sites in the near future.”

This policy is accompanied by Map 8 showing the proposed site layout for the West Road Site which is from the planning permission. There is no key or annotation to explain the layout or references to where the site is within the village for those who do not have local knowledge. It would benefit from annotations showing site features, access, connections and surrounding land uses.

The map would need to acknowledge a copyright.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56601

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** South Cambridgeshire District Council**Date received:** 23/11/2021 via Email**Summary:****GAM3 Local Character**

First bullet of the policy - The VDG identifies a number of architectural and spatial characteristics which are important to local character. The policy is being contradictory by stating in the first sentence that development will be supported where it follows the guidance in the VDG but then identifying only existing vernacular buildings as reference points for new design in the bullet point.

Second bullet point of policy - Protecting the unique structural layout of the village with the distinct gap between the main village and its hamlets is a key issue for the Plan. An inset map accompanying this policy annotated to show clearly the unique character of the parish with the main village and hamlets would have helped to clarify the purpose of the policy. Such a clear map is included within the VDG (Figure 6 page 9).

Second bullet point of policy - In the third sentence mention is made of preserving key views to and from the village and referring to both Maps 4 and 7. Only one map needs to be referenced in the policy and we would suggest Map 7.

These views also appear to be mentioned /protected by Policy GAM11. The views are listed in Appendix 2 and shown on the Key Policies areas Map 7. The last sentence of paragraph 4.32 states that the views are not just listed in Appendix 2 but illustrated which they are not. In neither policy GAM3 nor policy GAM11 is there a list of the views to be protected nor such a list in the supporting text. We consider without this information that this would be a difficult policy to implement successfully for developers drafting schemes and development management officers determining planning applications that may include proposals that impact views.

We are aware that additional assessment work was carried out following the Regulation 14 consultation and this has been submitted as an evidence document – Landscape and Visual Analysis (LVA) (July 2021). Most of the views listed in Appendix 2 of the Plan were identified in the VDG but the recent analysis identified two additional viewpoints, but no indication is given within the Plan as to which of the views these are. These are mentioned in the LVA as Key Views 6 and 7 but the Key View 7 Mill Bridge does not appear to have made it into the Plan as only 6 views are listed in Appendix 2. It is not clear whether View 7 would impact the Mill Hill employment Policy GAM5. It would help the future user of the plan if each view listed in Appendix 2 had a specific reference within a single policy and an inset map clearly showed each view. A brief description of each view could be included in the supporting text setting out its value. Such information is set out in the LVA. There should be a clearer link between the LVA and the policy protecting views.

Views appear to be to north and east of village. The policy protecting the hamlets is to the west and south which results in a cordon of protection around the village. We are concerned that this may not leave any room for future development. Developers could question the sustainability of the Plan if too much is protected.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
 Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
 SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
 Representation - <https://cambridge.oc2.uk/a/3v4sm>

56602

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: South Cambridgeshire District Council

Date received: 23/11/2021 via Email

Summary:

Local Economy and employment

We welcome the inclusion of Map 5A which shows the existing business sites, but this does not clearly identify the specific employment sites mentioned in the two employment policies. This would help those future users of the Plan who do not have a local knowledge of the parish. Other features are also shown on this map which do not relate to employment which is confusing e.g., Gamlingay Wood Cordon.

There are two policies regarding employment - GAM4 Local Employment Sites and GAM5 New Employment Sites – However both policies contain similar considerations to be taken into account by a developer and it is not entirely sure what is the difference between these two policies other than GAM5 is allocating a site whereas GAM4 is identifying sites.

Both policies include the permitted uses of the various sites e.g., Use class E(g). But the new use classes (2020) allows the change of use within Use Class E without requiring consent so the policies cannot specify a specific element of Use class E. This would be contrary to national policy and therefore not meet a basic conditions test.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56603

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: South Cambridgeshire District Council

Date received: 23/11/2021 via Email

Summary:

GAM4 Local Employment Sites

Station Rd, Church Street, Drove Road and Green End Industrial sites are each treated slightly differently in Policy GAM4 Local Employment Sites. In our earlier comments we had suggested that each site should have its own separate policy. We are aware that each site has its own character and requirements and constraints. Proposals will need to be suitable in scale for each location. Those sites on the edge of the village will need different consideration to those within the village. The policy currently drafted says all proposals are expected to protect and safeguard landscape features and designations. Each employment site may have different requirements/ constraints which are not clearly shown within this policy. Our Economic Development Officer does not consider that the policy as currently worded makes it clear what is appropriate development for each site. Such clarity would help any developer/ business/planner understand the key site issues early on. This would help expedite any application process and avoid unnecessary costs for all parties. If the aim is to support local businesses, the provision of as much information as possible up front is important.

Drove Road is outside of the development framework boundary of the village The Local Plan Policy S/7: Development Frameworks allows for site allocations to be permitted outside of the framework if they are within a made neighbourhood plan. Further development at Drove Road in GAM4 could be contrary to this strategic policy in the Local Plan if it is not a specific allocation.

The Drove Road employment site appears to be shown as two distinct sites on Map 5A, but without specific identification this is an assumption having to be made by the user of the Plan. The existing policy had evolved to refer specifically to the expansion of businesses in situ. We are aware that there has been concerns about the proposals in the local community which led to the site being included in GAM4 rather than GAM5. It is stated in paragraph 4.47 that the Strategic Environmental Assessment (SEA) concluded that development of previously undeveloped land at Drove Road has increased potential to lead to the loss of productive agricultural land, has increased potential to impact on biodiversity habitats and local character without mitigation measures. Whilst Drove Road is not being designated as a new employment area and policy GAM11 refers to Biodiversity net gain, given the results of the SEA specifically reference Drove Road, we consider that there needs to be specific reference in GAM4 on mitigating the impact of the expansion of businesses on biodiversity habitats/biodiversity net gain.

For Drove Road there are specific criteria that must be followed if a development proposal is to be successful. In the supporting text the justification for permitting an increase of 25% of the existing footprint is that put forward by local businesses in the area. Would 25% be suitable for all buildings within the Drove Rd sites? It is unclear whether an assessment has been carried out to confirm this. If development has to follow specific design criteria to be of an appropriate scale (what scale is appropriate?) and integrated into the landscape (how to achieve this). It should be spelt out more clearly within the policy and explained in the supporting text. This will assist a developer to ensure a proposal meets the requirements of this policy and for a development management officer or the Planning Committee at SCDC to determine a planning application against this policy. Would a version of Local Plan Policy E/12: New Employment Development in Villages relating to just the expansion of existing premises on Drove Road be more straightforward or indeed would the Local Plan policy be sufficient? There could be an explanation of what is considered appropriate scale in the supporting text.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
 Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
 SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
 Representation - <https://cambridge.oc2.uk/a/3v4sm>

56604

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** South Cambridgeshire District Council**Date received:** 23/11/2021 via Email**Summary:**

GAM5 New employment site allocations

Mill Hill is the only site allocated in GAM5 so this policy could be site specific to Mill Hill. Is Mill Hill to be an Employment site or a Rural Business Development Area? Both terms are used within the policy.

Paragraph 4.53 – This mentions that there are two new rural business development areas being allocated in the Plan when within the Policy GAM5 there is only one.

We have previously expressed our concerns on the inclusion of the B8 use in the policy wording for both employment policies. This has now been removed from GAM4 but remains in GAM5. Would applications for development of B8 uses be approved on the Mill Hill site regardless of scale or specific location constraints? Without restrictions on the scale of development that would be supported this could result in large sheds and the associated traffic generation. The policy must be clear on what would be supported. Although it has been highlighted to us that such uses already exist on this site this policy criterion would be positively encouraging such a use. If this is the case it could be contrary to the Local Plan Policy E/11: Large Scale Warehousing and Distribution Centres. This is a strategic policy in the Local Plan. This policy would not meet the basic condition test about being in general conformity with the strategic policies in the Local Plan.

We continue to have concerns about the way the policy is drafted. It does not restrict the amount of employment use allowed in the Mill Hill area – this is not supported by SCDC. We are not sure what the parish council's vision for this area is and how it is envisaged development would take place. Is it proposed to be piecemeal redevelopment on these sites or a comprehensive scheme? There would be implications for the provision of infrastructure to support such development. We would consider that if this site is to be developed comprehensively there should be a requirement included in the policy for a design framework or brief. A brief would help to shape the future development of the site and would be a useful tool to determine the appropriate capacity of the site identifying the constraints and opportunities of the site, setting out the design parameters for the layout and appearance, exploring improved connections and the impacts on existing infrastructure.

There are residential properties including a care home within the boundaries of the Mill Hill area. Whilst recognising that this policy now includes a section that states that any employment proposal has to demonstrate that there will be no adverse impacts on the rural environment and amenity or property of nearby residents, we remain concerned at the potential scale of development that could be allowed by this policy and controlling the amenity impact on nearby residents. We have previously suggested that the parish council should review the extent of what could be allowed by this policy

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
 Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
 SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
 Representation - <https://cambridge.oc2.uk/a/3v4sm>

56605

Support

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: South Cambridgeshire District Council

Date received: 23/11/2021 via Email

Summary:

Community amenities and facilities

We consider that this section would have benefited from having the supporting text for each different policy being with the policy rather than part of a long introduction that includes many issues.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56606

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** South Cambridgeshire District Council**Date received:** 23/11/2021 via Email**Summary:**

GAM6 Community Facilities

We consider that the first part of this policy is not saying anything specific for Gamlingay as it just repeating the Local Plan protecting services and facilities (SC/3) or meeting community needs (SC/4). It is unclear why mention is made here of the support for the creation of additional sports pitches.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56607

Support

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** South Cambridgeshire District Council**Date received:** 23/11/2021 via Email**Summary:**

GAM7 Designation of former First School buildings Green End

Map 9 - It would help if Map 9 only included the policies relevant to this part of the Plan. We are unsure what GAM1 Allocated Local Plan Site refers to as this policy does not allocate any sites. Also, open spaces are shown and there is no policy relating to these in the Plan unless these are the ones listed in Appendix 2

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56608

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: South Cambridgeshire District Council

Date received: 23/11/2021 via Email

Summary:

GAM 8 Reuse of first school buildings

We suggest that rather than stating a set period over which the site is safeguarded and could remain empty that the site is safeguarded unless it can be demonstrated that the site has been marketed for a period at a realistic price for educational and community uses, and nothing has been forthcoming.

Within the policy the first sentence ends with a collection of letters as examples. (Eg. (a,b,e,f,g)) We are not clear what this means.

We have previously suggested that the policy could have as a requirement that a design guide/masterplan be prepared for the site. Such a brief could clarify policies and their application to the site. There may be different interests in the development of the site, and these may sometimes conflict. The preparation of a brief provides an opportunity for such conflicts to be resolved and provide sound urban design principles to the development of the site.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56609

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** South Cambridgeshire District Council**Date received:** 23/11/2021 via Email**Summary:**

GAM9 Transport provision

Does the car parking element of the policy forming the second part of the policy add anything specific for Gamlingay?
The Local Plan Policy T1/3: Parking Provision is design led.

Second part of the policy – How will a housing development provide ‘enough car parking’ ...within the ‘development envelope’. Enough is not defined anywhere nor is the development envelope. Development should be providing car parking in accordance with the adopted standards unless the Neighbourhood Plan suggests otherwise through robust evidence.

There is no evidence or mention in the supporting text to support why level multi use surfaces should be avoided – is this a particular problem in Gamlingay? Context and number of units served should influence the road layout. Shared surfaces streets influence driver behaviour to reduce vehicular speed and improve road safety. We consider that, without supporting evidence, this is overly prescriptive.

We also have concerns about this part of the policy from a historic environment perspective. At present, it is framed very rigidly, and we are anxious that it might inadvertently lead to heavily engineered layouts in very small-scale developments, especially small plots leading off the village’s central streets. At present, such developments often do have shared surfaces, and the VDG identifies some developments with shared surfaces as being successful. We consider that this section should be more flexible to avoid unintentional harm to the historic character of the village

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56610

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** South Cambridgeshire District Council**Date received:** 23/11/2021 via Email**Summary:**

There has been discussions between the Section 106 officer and the parish council about this policy. He considers the principle of asking for contribution fine but that there needs to be a clear idea of what is to be included in the parish improvement plan for cycling etc. There are a number of issues that he considers need to be clarified.

Policy GAM10 mentions Map 10 – it is not clear whether the routes shown on this map are planned or existing routes to be improved. It is a map that includes other policies which distract from the cycling routes.

It is not clear whether the contributions set out in GAM10 are to be calculated on the gross internal floor area or gross external floor area. Are the contributions to be chargeable on extensions to existing business premises or whether (as currently worded) it is only chargeable on new units. Is there to be an intended floor on contributions (i.e. no contributions are payable where the total payable would be less than say £500?)

Clarification is needed as to whether the rates are subject to annual increase in indexation and if so which indexation is to be used. SCDC would suggest that indexation is applied annually from the date the plan is made by reference to BCIS All in Tender.

Policy GAM10 requires contributions of £21 per m2 of floor space (for business developments), and £10 per m2 of floor space (for housing developments). An explanation is needed as to why the housing contribution is £10 rather than £29 that Appendix 3 would suggest is the most appropriate figure to use. Consideration could be given to reducing the contribution for major developments where in kind works to provide new paths are required.

The plan should explain how much money is expected to be generated during the life of the plan, what alternative funding sources may exist and whether there are any particular priority areas in the event that the full amount is not secured.

The plan should explain whether there is County Council support for this proposal both in Cambridgeshire and Central Bedfordshire. We would imagine this is a key point to the implementation of the policy.

The plan should explain the delivery mechanism for provision of new footpaths, i.e. will this be direct Parish Council commissioning.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56611

Support

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: South Cambridgeshire District Council

Date received: 23/11/2021 via Email

Summary:

4.6 Natural environment

It may help to have the supporting text included in the justification section to be directly linked to the policy placed in the Plan next to the relevant text.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56612

Object

Supporting Documents, Gamlingay Neighbourhood Plan**Respondent:** South Cambridgeshire District Council**Date received:** 23/11/2021 via Email**Summary:**

GAM11 Landscape and natural environment

The policy has evolved since the pre-submission draft. There is no explanation in the supporting text as to what is meant by the term 'biodiversity metric tool' which is referred to in the first sentence. The examples of biodiversity projects should be included in the supporting text rather than in the policy. It does not create a clear policy for implementing.

The first section of this policy refers to key 'wildlife corridors...and a network of green spaces/infrastructure' but the Plan does not provide a map to show where the existing corridors and green network are within the parish. Appendix 2 entitled Gamlingay's green infrastructure does provide lists of different green features but unfortunately these have not been brought together in a map in the Plan. The VDG does show open space on page 14 which could have been included in the Plan to give added weight to protection of corridors. The VDG talks of green fingers of landscape from centre of village to rural edge – these could have been shown in a map in this Plan and thereby helped to protect them.

Last sentence of first section of the policy – We consider that the proposed network of green spaces should be for habitat creation and not just for sport and recreation.

The second section of the policy - The policy states that only housing and employment developments should not obstruct, or damage valued sites referred to – surely all development should protect these sites? It is not clear in the policy how the green spaces within a development are not to become isolated rather than linked to the wider green network of the parish especially if this is not mapped. How could this policy be implemented without identifying the green sites included in Appendix 2 on a map?

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>

56613

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: South Cambridgeshire District Council

Date received: 23/11/2021 via Email

Summary:

Our ecology officer considers that policy should refer to the fact that this wood is an ancient woodland. It is designated as an SSSI because it is an ancient woodland, so this designation is important.

The 200m cordon we understand is to allow for countryside uses for those using the woodland. This should be explained more clearly in the supporting text rather than simply stating it is for the enjoyment of future generations but then mentioning in the policy that it is to allow for small scale sustainable construction for the traditional woodland industry.

This needs to be explained and evidenced as to why the 200m cordon is chosen as opposed to some other distance.

Attachments: Representation Letter - <https://cambridge.oc2.uk/a/3v4sj>
Representation Appendix 1 - <https://cambridge.oc2.uk/a/3v4sk>
SCDC Appendix - <https://cambridge.oc2.uk/a/3v4sz>
Representation - <https://cambridge.oc2.uk/a/3v4sm>



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web: www. cen projects.com

Friday, 19 November 2021

BY email to:
neighbourhood.planning@greatercambridgeplanning.org

Dear Sir/Madam,

GAMLINGAY NEIGHBOURHOOD PLAN SUBMISSION – AUGUST 2021

On behalf of our client [REDACTED] we provide our comments below on the submission version of the Gamlingay Neighbourhood Plan.

Vision and Objectives

Objective 1: We will meet the needs of the local community by supporting new housing that is of appropriate size, affordable and adaptable. All new buildings will be built to high environmental standards.

We support this objective. As set out later in the plan, there is a clear need for sustainable affordable homes, in particular 1-2-bedroom dwellings and bungalows.

A further Housing Needs Survey was carried out in September and October 2021. Snapshot data from the survey and housing register is turned into an annual flow of households in affordable using the Government's Basic Needs Assessment Model. The main findings of the model are that:

- every year for the next 5-years a minimum of 27 households will be in affordable housing need, 135 households over 5-years;
- 55% will seek affordable rented housing and 45% will seek affordable home ownership; and
- a mixture of 1, 2 and 3 bedroom bungalows semi detached and terraced houses are needed.

Objective 2: In order to maintain the integrity of Gamlingay as a radial village with satellite hamlets and smallholdings, we will protect the open countryside and landscape setting. We will protect our built heritage. Alterations to existing buildings and new buildings will reflect and contribute to the strong character of the built heritage expressed in the Village Design Guide.

This objective should include support for rural exception sites to meet an affordable housing need, as long as they are well-designed. Rural exception sites are supported in the South Cambridgeshire

Local Plan (2018) at Policy H/11 permits rural exception sites on small sites at locations within or adjacent to existing settlements.

Objective 4: We will protect valued local amenities and seek developer contributions to ensure that local facilities adapt to meet the needs of our growing community.

We support this objective. The NPPF (2021) at para. 79 states that:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

Objective 5: We will develop a network of paths to promote walking, cycling and riding for everyday journeys and recreation. We will reduce congestion by encouraging more parking provision.

We support the promotion of walking, cycling and riding. However with regard to car parking, the policy should be in line with South Cambridgeshire Local Plan Policy TI/3: Parking Provision which states that:

“Car parking provision will take into consideration the site location, type and mix of uses, car ownership levels, availability of local services, facilities and public transport, and highway and user safety issues, as well as ensuring appropriate parking for people with impaired mobility.”

The objective therefore should not be to encourage more parking provision, but rather to provide levels of parking appropriate to the site and circumstances.

Paragraph 4.23

This paragraph states that housing sites must fall within the development framework.

We object to this because there is no reference to rural exception sites. These are permitted according to South Cambridgeshire Local Plan Policy H/11, so the text should be amended to reflect this.

Policy GAM1 – New houses and employment buildings

We support this draft policy, specifically the requirement for housing development to “provide a mix of homes, in particular one- or two-bedroom dwellings and bungalows.”

Housing surveys have shown a clear need for 1-2 bedroom properties and bungalows and affordable bungalows according to Table 3 of the Plan have not been delivered.

As stated in paras. 4.12 and 4.13 of the Plan, the Housing Needs Survey (2018) indicates a particular demand for smaller 1-2-bedroom homes and bungalows in order to meet the needs of single people requiring accommodation on their own, as well as older people seeking to downsize. Market conditions showed a glut of larger 4- and 5-bedroom houses for sale in the parish, with only one 2-bedroom property available in December 2017.

A further Housing Needs Survey was carried out in September and October 2021. Snapshot data from the survey and housing register is turned into an annual flow of households in affordable using the Government's Basic Needs Assessment Model. The main findings of the model are that:

- every year for the next 5-years a minimum of 27 households will be in affordable housing need, 135 households over 5-years;
- 55% will seek affordable rented housing and 45% will seek affordable home ownership; and
- a mixture of 1, 2 and 3 bedroom bungalows semi detached and terraced houses are needed.

Further information on this survey is provided under the heading 'Proposed site allocation' below.

Page 43

The text box on page 43 states that the right place for new homes is within the boundary of the village.

We object to this because there is no reference to rural exception sites. These are permitted according to South Cambridgeshire Local Plan Policy H/11, so the text should be amended to reflect this.

Paragraph 4.31

This paragraph states that new homes should be within the boundary of the village.

We object to this because there is no reference to rural exception sites. These are permitted according to South Cambridgeshire Local Plan Policy H/11, so the text should be amended to reflect this.

Policy GAM3 – Local character

The draft policy states that:

“Housing will be located within the boundary of Gamlingay village (its development framework) to prevent the village, the hamlets and smallholdings from joining up, to preserve the visual quality of the landscape and retain the separate identities of the settlements.”

We object to this policy because there is no reference to rural exception sites. These are permitted according to South Cambridgeshire Local Plan Policy H/11, so the policy should be amended to reflect this.

Policy GAM6 – Community amenities and facilities

We support the protection of community amenities and facilities.

Policy GAM9 – Transport provision on developments

The draft policy states that “Situating within the village framework, new housing will be located within convenient walking or cycling distance to village facilities”.

We object to this policy – the policy should be amended to refer to rural exception sites and should also refer to locations within easy reach of a bus stop.

Proposed site allocation

We propose the site Land at Potton Road, Mill Hill, Gamlingay as a further housing allocation (for sustainable affordable homes). A map is included at Appendix 1.

A Housing Needs Survey was carried out in September and October 2021. All households in the parish were invited to respond to the questionnaire. 1,676 questionnaires were dispatched and 204 responses were received. Survey data was processed to find out how many households were in affordable housing need and planned to move home to find more suitable housing that they could afford in the parish. The number of new households likely to form and be in affordable need over the next 5-years was also estimated from information provided by respondents. Information was collected about number of bedrooms needed and household preferences for affordable rented or affordable home ownership (e.g. shared ownership).

The Government's good practice guidance for housing needs surveys states that more than one source of data should be used to estimate levels of affordable housing need. This is because parish housing surveys cannot collect information from households with a local connection that do not live in the parish and not all households respond to the survey. Housing registers underestimate need as registration is voluntary, only records need for affordable rented housing and does not take account of future need from newly forming households. Therefore both methods tend to undercount local need for affordable housing.

Snapshot data from the survey and housing register is turned into an annual flow of households in affordable using the Government's Basic Needs Assessment Model. The main findings of the model are that:

- every year for the next 5-years a minimum of 27 households will be in affordable housing need, 135 households over 5-years;
- 55% will seek affordable rented housing and 45% will seek affordable home ownership; and
- a mixture of 1, 2 and 3 bedroom bungalows semi detached and terraced houses are needed.

Supply from vacancies and new build affordable homes must be taken into account over this 5-year period. We note that 34 affordable homes including 10 shared ownership homes will be built in the parish on the former Green End industrial estate over the next few years.

Our overall finding is that even taking supply into account there will still be a need for 15 affordable rented and 49 affordable home ownership dwellings over the 5-year period.

This level of need is mostly due to the level of local house prices. The HNS demonstrates that although prices are lower than for South Cambridgeshire as a whole, they are still not affordable to many households needing to move to more suitable housing.

We also had responses from home owners seeking more suitable housing at market prices. Many are seeking to upsize to 4-bedroom homes. We note that Gamlingay has a smaller proportion of 4-bedroom homes than South Cambridgeshire as a whole.

The proposed site at Land at Potton Road falls outside the Gamlingay settlement boundary, however as it is previously developed land (a former scrap yard) it is sequentially preferable to many alternative greenfield locations. In addition, the site has an extant consent for B class employment uses. If this was implemented, the site could be in commercial use and there would be workers commuting to and from the site, and at lunchtimes (as there are no facilities currently on the site).

The NPPF (paragraphs 122 and 130) encourages the effective use of land by reusing land that has been previously developed provided that it is not of high environmental value. The site is not considered to be of high environmental value (as it is not within the Green Belt, nor are there any other protected designations) and therefore the re-development of the site would be in line with this key aim.

The Council's leaflet on rural exception sites states that these can only be brought forward if there is a proven unmet local need for affordable housing. The Housing Needs Survey results demonstrate that there is a proven unmet local need for affordable housing. The Neighbourhood Plan Submission does not include any affordable housing sites.

A sustainable affordable housing development on this site would support local shops and services in Gamlingay, and also in nearby Potton, in accordance with the NPPF paragraph 79 which states that housing should be located where it will enhance or maintain the vitality of rural communities, as well as the Neighbourhood Plan Draft Objective 4 which seeks to support local facilities. There is a farm shop and café opposite the site and therefore the site is in close proximity to local facilities. Furthermore, on-site facilities could be included in any development.

Transport options for the site include an eco-friendly shuttle bus between the site and the village, a contribution towards local bus services or a car rental scheme, a bike hire scheme and electric vehicle charging points.

Summary

Please take these representations into account. Should you have any queries then please do contact me on tel. [REDACTED] or [REDACTED], alternatively my colleague Simran Kang will be happy to assist [REDACTED] or [REDACTED].

Yours faithfully,

Gemma Jenkinson

BSc (Hons) MSc MRTPI
Director of the Midlands, Planning

APPENDIX 1



Appendix 1

South Cambridgeshire District Council's response to the consultation on the submission Gamlingay Neighbourhood Plan

1. South Cambridge District Council (SCDC) is taking the opportunity, through the Regulation 16 consultation, to comment further on the Gamlingay Neighbourhood Plan.
2. SCDC has worked with Gamlingay Parish Council (PC) during the preparation of the plan. We appreciate the hard work that has gone into getting their neighbourhood plan this far along the process. There have been meetings with the neighbourhood plan team to discuss the plan as it has evolved. SCDC has provided constructive comments to the team at these meetings followed up by detailed notes to assist them in their plan making.
3. SCDC notes that some changes to the Submission version of the Gamlingay Neighbourhood Plan have been made as a result of the comments that we submitted during the pre-submission consultation (Regulation 14). These comments by SCDC are set out in the Gamlingay Neighbourhood Plan Consultation Statement – Appendix 9 pages 72-130.
4. The comments we make now concentrate on matters that relate directly to whether, in our opinion, the Plan meets the Basic Conditions.

Policies Map and Maps

5. Planning Practice Guidance states that “The policies map should illustrate geographically the policies in the plan and be reproduced from, or based on, an Ordnance Survey map.” (Reference ID: 61-002-20190315) Although it is acknowledged that a single Policies Map is not a requirement for a Neighbourhood Plan, SCDC considers that, for a Plan area like Gamlingay, such a map helps in providing clarity to those policies that include site allocations and site-specific issues. The Plan does include Map 7 which is entitled ‘Key Policy Areas 1-12’. This map has evolved since the Regulation 14 version and now includes most of the site-specific policies in the Plan. It remains at A4 size which we consider to be too small to clearly show all the policy areas. There are some symbols in the key which still do not reference which policy they refer to e.g., Views and 200m cordon for Gamlingay Wood. Within the central built-up area of the parish, it is particularly difficult to identify the boundaries of sites which, unless changed, could result in a misinterpretation of the Neighbourhood Plan when being used to determine planning applications.
6. The problem of clarity is compounded by the fact that there are several maps in the Plan which do not always clearly show boundaries of any site allocations and designations. Such an example is Map 6, showing village

amenities. For future users of the Plan – including decision makers such as planning officers and the planning committee – or on appeal - Planning Inspectors, who may not be totally familiar with the parish it is essential that any boundaries/areas are clearly and definitively shown with simple keys indicating what each symbol on the maps means. We have found the keys difficult to read both in the printed versions of the Plan or when enlarged on the screen of a laptop. This risks undermining the effectiveness of the plan and its policies. The font used must be larger.

7. Many of the maps contain too much information showing areas not related to the part of the Plan where they have been positioned. For example, Map 9 showing Local Green Space also has references to GAM1. Map 10 shows walking and cycling routes as well as the Development Framework and open spaces that are not protected in the Plan or in the Local Plan. Further, the Plan should also have a map specifically showing the views being protected under Policies GAM3 and GAM11.
8. All maps need to ensure that they have the required copyright permissions which needs to be correctly worded especially when Ordnance Survey (OS) maps have been used - the copyright and licence information must be legible.

Comments on the draft Plan in plan order

9. As a footnote on page 8 a Disclaimer has been included. We have not seen this included in a Neighbourhood Plan before and do not think it is necessary here given that the Plan is the responsibility of the Parish Council's and, it is them who have approved the plan for submission to SCDC.

Introduction

10. Map 1 shows the neighbourhood area for Gamlingay – we would recommend using a stronger map base that enable readers to find key information. In this instance, because land west of the parish boundary is in Bedfordshire, it might help if parish and district names and the district boundary were illustrated, and the boundaries clearly shown. A Neighbourhood Plan must be clear about the area that it covers.

Chapter 2

11. Map 4 shows landscape settings. It would help the future user of the Plan if there were a greater distinction between the green shadings shown on the map. They look somewhat the same. The key refers to 'examples of good design' but does not name these two places or provide any supporting details for why these are examples of good design.
12. Map 6 showing Village Amenities –This map is attempting to show much information across the whole parish. By having a parish wide map this has resulted in the village centre, where many of the facilities are located, at a

very small scale and it is not possible to define the exact location of those facilities.

Chapter 3 Our vision

13. With regards to Objective 1, it is not clear how the reference to 'high environmental standards' is defined. For the sake of clarity, it may be better for the Neighbourhood Plan to promote new development that seeks to 'exceed the baseline policy requirements for sustainability set out in section 4 of the Local Plan, supporting the transition to net zero carbon and the move away from fossil fuels.'

Chapter 4 Policies

14. In general, there is nothing in the Plan to acknowledge whether it has been prepared in the context of the 2019 NPPF, which would have been current at the time of the Regulation 14 consultation, or the 2021 NPPF which is now current.

Housing Growth

15. Justification – The footnote does not reference the latest NPPF.
16. Paragraph 4.10 – This paragraph is telling a confusing story about housing within the parish. It does not need to outline the methodology used by SCDC to provide the housing requirement for Gamlingay as is required by paragraph 67 in the NPPF (2021). This housing requirement for Gamlingay has always been 26 dwellings and has not been amended.
17. We have consulted with our housing team and they remain concerned about the housing needs survey (HNS) that accompanies the Plan. Whilst noting that the term 'recent snapshot of housing need' has been added to the description of the HNS we do not feel that the figures are a robust assessment of need as the assessment only looks at the needs of the 90 respondents that completed the Gamlingay survey. It should also be recognised that the 2018 Bedfordshire RCC Survey represents a snapshot in time and that new evidence might come forward during the Plan period to demonstrate a different need.
18. We consider that the Plan incorrectly states in paragraph 4.14 that there is therefore no anticipated requirement for housing exception sites during the lifetime of this neighbourhood plan. An Exception site is an exception to policy based on the local housing needs at that point in time. The Plan cannot state there is no further need during the next 5 years for this reason until a HNS is undertaken at that moment in time. The housing needs figure is different from the local housing need for affordable housing which is likely to vary over time. The statement that there is no anticipated requirement for housing exception sites (Paragraph 4.14) might be undermined if a new survey were carried out that identified a need.

GAM1 New Buildings

19. Policy Bullet 1 - This policy could be more specific about meeting the local housing need for smaller dwellings for youngsters and for downsizing.
20. Policy Bullet 2 - The Policy is seeking to set standards of insulation that are restricted by the 2015 Ministerial Statement that states that neighbourhood plans should not set local standards. Energy Performance Certificate (EPC) ratings A is regulated by building regulations not planning policy. By including this requirement, the policy would not be taking account of national planning policy and likely to be removed by an examiner.
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consideration to those within the village. The policy currently drafted says all proposals are expected to protect and safeguard landscape features and designations. Each employment site may have different requirements/ constraints which are not clearly shown within this policy. Our Economic Development Officer does not consider that the policy as currently worded makes it clear what is appropriate development for each site. Such clarity would help any developer/ business/planner understand the key site issues early on. This would help expedite any application process and avoid unnecessary costs for all parties. If the aim is to support local businesses, the provision of as much information as possible up front is important.

39. Drove Road is outside of the development framework boundary of the village. The Local Plan Policy S/7: Development Frameworks allows for site allocations to be permitted outside of the framework if they are within a made neighbourhood plan. Further development at Drove Road in GAM4 could be contrary to this strategic policy in the Local Plan if it is not a specific allocation.
40. The Drove Road employment site appears to be shown as two distinct sites on Map 5A, but without specific identification this is an assumption having to be made by the user of the Plan. The existing policy had evolved to refer specifically to the expansion of businesses in situ. We are aware that there has been concerns about the proposals in the local community which led to the site being included in GAM4 rather than GAM5. It is stated in paragraph 4.47 that the Strategic Environmental Assessment (SEA) concluded that development of previously undeveloped land at Drove Road has increased potential to lead to the loss of productive agricultural land, has increased potential to impact on biodiversity habitats and local character without mitigation measures. Whilst Drove Road is not being designated as a new employment area and policy GAM11 refers to Biodiversity net gain, given the results of the SEA specifically reference Drove Road, we consider that there needs to be specific reference in GAM4 on mitigating the impact of the expansion of businesses on biodiversity habitats/biodiversity net gain.
41. For Drove Road there are specific criteria that must be followed if a development proposal is to be successful. In the supporting text the justification for permitting an increase of 25% of the existing footprint is that put forward by local businesses in the area. Would 25% be suitable for all buildings within the Drove Rd sites? It is unclear whether an assessment has been carried out to confirm this. If development has to follow specific design criteria to be of an appropriate scale (what scale is appropriate?) and integrated into the landscape (how to achieve this). It should be spelt out more clearly within the policy and explained in the supporting text. This will assist a developer to ensure a proposal meets the requirements of this policy and for a development management officer or the Planning Committee at SCDC to determine a planning application against this policy. Would a version of Local Plan Policy E/12: New Employment Development in Villages relating to just the expansion of existing premises on Drove Road be more straightforward or indeed would the Local Plan policy be sufficient? There could be an explanation of what is considered appropriate scale in the supporting text.

GAM5 New employment sites allocations

42. Mill Hill is the only site allocated in GAM5 so this policy could be site specific to Mill Hill. Is Mill Hill to be an Employment site or a Rural Business Development Area? Both terms are used within the policy.
43. Paragraph 4.53 – This mentions that there are two new rural business development areas being allocated in the Plan when within the Policy GAM5 there is only one.
44. We have previously expressed our concerns on the inclusion of the B8 use in the policy wording for both employment policies. This has now been removed from GAM4 but remains in GAM5. Would applications for development of B8 uses be approved on the Mill Hill site regardless of scale or specific location constraints? Without restrictions on the scale of development that would be supported this could result in large sheds and the associated traffic generation. The policy must be clear on what would be supported. Although it has been highlighted to us that such uses already exist on this site this policy criterion would be positively encouraging such a use. If this is the case it could be contrary to the Local Plan Policy E/11: Large Scale Warehousing and Distribution Centres. This is a strategic policy in the Local Plan. This policy would not meet the basic condition test about being in general conformity with the strategic policies in the Local Plan.
45. We continue to have concerns about the way the policy is drafted. It does not restrict the amount of employment use allowed in the Mill Hill area – this is not supported by SCDC. We are not sure what the parish council's vision for this area is and how it is envisaged development would take place. Is it proposed to be piecemeal redevelopment on these sites or a comprehensive scheme? There would be implications for the provision of infrastructure to support such development. We would consider that if this site is to be developed comprehensively there should be a requirement included in the policy for a design framework or brief. A brief would help to shape the future development of the site and would be a useful tool to determine the appropriate capacity of the site identifying the constraints and opportunities of the site, setting out the design parameters for the layout and appearance, exploring improved connections and the impacts on existing infrastructure.
46. There are residential properties including a care home within the boundaries of the Mill Hill area. Whilst recognising that this policy now includes a section that states that any employment proposal has to demonstrate that there will be no adverse impacts on the rural environment and amenity or property of nearby residents, we remain concerned at the potential scale of development that could be allowed by this policy and controlling the amenity impact on nearby residents. We have previously suggested that the parish council should review the extent of what could be allowed by this policy.

Community amenities and facilities

47. We consider that this section would have benefited from having the supporting text for each different policy being with the policy rather than part of a long introduction that includes many issues.

GAM6 Community Facilities

48. We consider that the first part of this policy is not saying anything specific for Gamlingay as it just repeating the Local Plan protecting services and facilities (SC/3) or meeting community needs (SC/4). It is unclear why mention is made here of the support for the creation of additional sports pitches.

GAM7- Designation of former First School buildings, Green End (TL 234647 52413)

49. Map 9 - It would help if Map 9 only included the policies relevant to this part of the Plan. We are unsure what GAM1 Allocated Local Plan Site refers to as this policy does not allocate any sites. Also, open spaces are shown and there is no policy relating to these in the Plan unless these are the ones listed in Appendix 2.

GAM8 Reuse of first school building.

50. We suggest that rather than stating a set period over which the site is safeguarded and could remain empty that the site is safeguarded unless it can be demonstrated that the site has been marketed for a period at a realistic price for educational and community uses, and nothing has been forthcoming.
51. Within the policy the first sentence ends with a collection of letters as examples. (Eg. (a,b,e,f,g)) We are not clear what this means.
52. We have previously suggested that the policy could have as a requirement that a design guide/masterplan be prepared for the site. Such a brief could clarify policies and their application to the site. There may be different interests in the development of the site, and these may sometimes conflict. The preparation of a brief provides an opportunity for such conflicts to be resolved and provide sound urban design principles to the development of the site.

GAM9 Transport provision

53. Does the car parking element of the policy forming the second part of the policy add anything specific for Gamlingay? The Local Plan Policy TI/3: Parking Provision is design led.

54. Second part of the policy – How will a housing development provide ‘enough car parking’ ...within the ‘development envelope’. Enough is not defined anywhere nor is the development envelope. Development should be providing car parking in accordance with the adopted standards unless the Neighbourhood Plan suggests otherwise through robust evidence.
55. There is no evidence or mention in the supporting text to support why level multi use surfaces should be avoided – is this a particular problem in Gamlingay? Context and number of units served should influence the road layout. Shared surfaces streets influence driver behaviour to reduce vehicular speed and improve road safety. We consider that, without supporting evidence, this is overly prescriptive.
56. We also have concerns about this part of the policy from a historic environment perspective. At present, it is framed very rigidly, and we are anxious that it might inadvertently lead to heavily engineered layouts in very small-scale developments, especially small plots leading off the village’s central streets. At present, such developments often do have shared surfaces, and the VDG identifies some developments with shared surfaces as being successful. We consider that this section should be more flexible to avoid unintentional harm to the historic character of the village.

GAM10 Contributions

57. There has been discussions between the Section 106 officer and the parish council about this policy. He considers the principle of asking for contribution fine but that there needs to be a clear idea of what is to be included in the parish improvement plan for cycling etc. There are a number of issues that he considers need to be clarified.
58. Policy GAM10 mentions Map 10 – it is not clear whether the routes shown on this map are planned or existing routes to be improved. It is a map that includes other policies which distract from the cycling routes.
59. It is not clear whether the contributions set out in GAM10 are to be calculated on the gross internal floor area or gross external floor area. Are the contributions to be chargeable on extensions to existing business premises or whether (as currently worded) it is only chargeable on new units. Is there to be an intended floor on contributions (i.e. no contributions are payable where the total payable would be less than say £500?)
60. Clarification is needed as to whether the rates are subject to annual increase in indexation and if so which indexation is to be used. SCDC would suggest that indexation is applied annually from the date the plan is made by reference to BCIS All in Tender.
61. Policy GAM10 requires *contributions of £21 per m² of floor space (for business developments), and £10 per m² of floor space (for housing developments)*. An explanation is needed as to why the housing contribution

is £10 rather than £29 that Appendix 3 would suggest is the most appropriate figure to use. Consideration could be given to reducing the contribution for major developments where in kind works to provide new paths are required.

62. The plan should explain how much money is expected to be generated during the life of the plan, what alternative funding sources may exist and whether there are any particular priority areas in the event that the full amount is not secured.
63. The plan should explain whether there is County Council support for this proposal both in Cambridgeshire and Central Bedfordshire. We would imagine this is a key point to the implementation of the policy.
64. The plan should explain the delivery mechanism for provision of new footpaths, i.e. will this be direct Parish Council commissioning.

4.6 Natural Environment

65. It may help to have the supporting text included in the justification section to be directly linked to the policy placed in the Plan next to the relevant text.

GAM11 Landscape and natural environment

66. The policy has evolved since the pre-submission draft. There is no explanation in the supporting text as to what is meant by the term 'biodiversity metric tool' which is referred to in the first sentence. The examples of biodiversity projects should be included in the supporting text rather than in the policy. It does not create a clear policy for implementing.
67. The first section of this policy refers to key 'wildlife corridors...and a network of green spaces/infrastructure' but the Plan does not provide a map to show where the existing corridors and green network are within the parish. Appendix 2 entitled Gamlingay's green infrastructure does provide lists of different green features but unfortunately these have not been brought together in a map in the Plan. The VDG does show open space on page 14 which could have been included in the Plan to give added weight to protection of corridors. The VDG talks of green fingers of landscape from centre of village to rural edge – these could have been shown in a map in this Plan and thereby helped to protect them.
68. Last sentence of first section of the policy – We consider that the proposed network of green spaces should be for habitat creation and not just for sport and recreation.
69. The second section of the policy - The policy states that only housing and employment developments should not obstruct, or damage valued sites referred to – surely all development should protect these sites? It is not clear in the policy how the green spaces within a development are not to become isolated rather than linked to the wider green network of the parish especially if this is not mapped. How could this policy be implemented without identifying the green sites included in Appendix 2 on a map?

GAM12 Gamlingay Wood

70. Our ecology officer considers that policy should refer to the fact that this wood is an ancient woodland. It is designated as an SSSI because it is an ancient woodland, so this designation is important.
71. The 200m cordon we understand is to allow for countryside uses for those using the woodland. This should be explained more clearly in the supporting text rather than simply stating it is for the enjoyment of future generations but then mentioning in the policy that it is to allow for small scale sustainable construction for the traditional woodland industry. This needs to be explained and evidenced as to why the 200m cordon is chosen as opposed to some other distance.

Appendix 1

South Cambridgeshire District Council's response to the consultation on the submission Gamlingay Neighbourhood Plan

1. South Cambridge District Council (SCDC) is taking the opportunity, through the Regulation 16 consultation, to comment further on the Gamlingay Neighbourhood Plan.
2. SCDC has worked with Gamlingay Parish Council (PC) during the preparation of the plan. We appreciate the hard work that has gone into getting their neighbourhood plan this far along the process. There have been meetings with the neighbourhood plan team to discuss the plan as it has evolved. SCDC has provided constructive comments to the team at these meetings followed up by detailed notes to assist them in their plan making.
3. SCDC notes that some changes to the Submission version of the Gamlingay Neighbourhood Plan have been made as a result of the comments that we submitted during the pre-submission consultation (Regulation 14). These comments by SCDC are set out in the Gamlingay Neighbourhood Plan Consultation Statement – Appendix 9 pages 72-130.
4. The comments we make now concentrate on matters that relate directly to whether, in our opinion, the Plan meets the Basic Conditions.

Policies Map and Maps

5. Planning Practice Guidance states that “The policies map should illustrate geographically the policies in the plan and be reproduced from, or based on, an Ordnance Survey map.” (Reference ID: 61-002-20190315) Although it is acknowledged that a single Policies Map is not a requirement for a Neighbourhood Plan, SCDC considers that, for a Plan area like Gamlingay, such a map helps in providing clarity to those policies that include site allocations and site-specific issues. The Plan does include Map 7 which is entitled ‘Key Policy Areas 1-12’. This map has evolved since the Regulation 14 version and now includes most of the site-specific policies in the Plan. It remains at A4 size which we consider to be too small to clearly show all the policy areas. There are some symbols in the key which still do not reference which policy they refer to e.g., Views and 200m cordon for Gamlingay Wood. Within the central built-up area of the parish, it is particularly difficult to identify the boundaries of sites which, unless changed, could result in a misinterpretation of the Neighbourhood Plan when being used to determine planning applications.
6. The problem of clarity is compounded by the fact that there are several maps in the Plan which do not always clearly show boundaries of any site allocations and designations. Such an example is Map 6, showing village

amenities. For future users of the Plan – including decision makers such as planning officers and the planning committee – or on appeal - Planning Inspectors, who may not be totally familiar with the parish it is essential that any boundaries/areas are clearly and definitively shown with simple keys indicating what each symbol on the maps means. We have found the keys difficult to read both in the printed versions of the Plan or when enlarged on the screen of a laptop. This risks undermining the effectiveness of the plan and its policies. The font used must be larger.

7. Many of the maps contain too much information showing areas not related to the part of the Plan where they have been positioned. For example, Map 9 showing Local Green Space also has references to GAM1. Map 10 shows walking and cycling routes as well as the Development Framework and open spaces that are not protected in the Plan or in the Local Plan. Further, the Plan should also have a map specifically showing the views being protected under Policies GAM3 and GAM11.
8. All maps need to ensure that they have the required copyright permissions which needs to be correctly worded especially when Ordnance Survey (OS) maps have been used - the copyright and licence information must be legible.

Comments on the draft Plan in plan order

9. As a footnote on page 8 a Disclaimer has been included. We have not seen this included in a Neighbourhood Plan before and do not think it is necessary here given that the Plan is the responsibility of the Parish Council's and, it is them who have approved the plan for submission to SCDC.

Introduction

10. Map 1 shows the neighbourhood area for Gamlingay – we would recommend using a stronger map base that enable readers to find key information. In this instance, because land west of the parish boundary is in Bedfordshire, it might help if parish and district names and the district boundary were illustrated, and the boundaries clearly shown. A Neighbourhood Plan must be clear about the area that it covers.

Chapter 2

11. Map 4 shows landscape settings. It would help the future user of the Plan if there were a greater distinction between the green shadings shown on the map. They look somewhat the same. The key refers to 'examples of good design' but does not name these two places or provide any supporting details for why these are examples of good design.
12. Map 6 showing Village Amenities –This map is attempting to show much information across the whole parish. By having a parish wide map this has resulted in the village centre, where many of the facilities are located, at a

very small scale and it is not possible to define the exact location of those facilities.

Chapter 3 Our vision

13. With regards to Objective 1, it is not clear how the reference to 'high environmental standards' is defined. For the sake of clarity, it may be better for the Neighbourhood Plan to promote new development that seeks to 'exceed the baseline policy requirements for sustainability set out in section 4 of the Local Plan, supporting the transition to net zero carbon and the move away from fossil fuels.'

Chapter 4 Policies

14. In general, there is nothing in the Plan to acknowledge whether it has been prepared in the context of the 2019 NPPF, which would have been current at the time of the Regulation 14 consultation, or the 2021 NPPF which is now current.

Housing Growth

15. Justification – The footnote does not reference the latest NPPF.
16. Paragraph 4.10 – This paragraph is telling a confusing story about housing within the parish. It does not need to outline the methodology used by SCDC to provide the housing requirement for Gamlingay as is required by paragraph 67 in the NPPF (2021). This housing requirement for Gamlingay has always been 26 dwellings and has not been amended.
17. We have consulted with our housing team and they remain concerned about the housing needs survey (HNS) that accompanies the Plan. Whilst noting that the term 'recent snapshot of housing need' has been added to the description of the HNS we do not feel that the figures are a robust assessment of need as the assessment only looks at the needs of the 90 respondents that completed the Gamlingay survey. It should also be recognised that the 2018 Bedfordshire RCC Survey represents a snapshot in time and that new evidence might come forward during the Plan period to demonstrate a different need.
18. We consider that the Plan incorrectly states in paragraph 4.14 that there is therefore no anticipated requirement for housing exception sites during the lifetime of this neighbourhood plan. An Exception site is an exception to policy based on the local housing needs at that point in time. The Plan cannot state there is no further need during the next 5 years for this reason until a HNS is undertaken at that moment in time. The housing needs figure is different from the local housing need for affordable housing which is likely to vary over time. The statement that there is no anticipated requirement for housing exception sites (Paragraph 4.14) might be undermined if a new survey were carried out that identified a need.

GAM1 New Buildings

19. Policy Bullet 1 - This policy could be more specific about meeting the local housing need for smaller dwellings for youngsters and for downsizing.
20. Policy Bullet 2 - The Policy is seeking to set standards of insulation that are restricted by the 2015 Ministerial Statement that states that neighbourhood plans should not set local standards. Energy Performance Certificate (EPC) ratings A is regulated by building regulations not planning policy. By including this requirement, the policy would not be taking account of national planning policy and likely to be removed by an examiner.
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GAM4 Local Employment Sites

38. Station Rd, Church Street, Drove Road and Green End Industrial sites are each treated slightly differently in Policy GAM4 Local Employment Sites. In our earlier comments we had suggested that each site should have its own separate policy. We are aware that each site has its own character and requirements and constraints. Proposals will need to be suitable in scale for each location. Those sites on the edge of the village will need different

consideration to those within the village. The policy currently drafted says all proposals are expected to protect and safeguard landscape features and designations. Each employment site may have different requirements/ constraints which are not clearly shown within this policy. Our Economic Development Officer does not consider that the policy as currently worded makes it clear what is appropriate development for each site. Such clarity would help any developer/ business/planner understand the key site issues early on. This would help expedite any application process and avoid unnecessary costs for all parties. If the aim is to support local businesses, the provision of as much information as possible up front is important.

39. Drove Road is outside of the development framework boundary of the village. The Local Plan Policy S/7: Development Frameworks allows for site allocations to be permitted outside of the framework if they are within a made neighbourhood plan. Further development at Drove Road in GAM4 could be contrary to this strategic policy in the Local Plan if it is not a specific allocation.
40. The Drove Road employment site appears to be shown as two distinct sites on Map 5A, but without specific identification this is an assumption having to be made by the user of the Plan. The existing policy had evolved to refer specifically to the expansion of businesses in situ. We are aware that there has been concerns about the proposals in the local community which led to the site being included in GAM4 rather than GAM5. It is stated in paragraph 4.47 that the Strategic Environmental Assessment (SEA) concluded that development of previously undeveloped land at Drove Road has increased potential to lead to the loss of productive agricultural land, has increased potential to impact on biodiversity habitats and local character without mitigation measures. Whilst Drove Road is not being designated as a new employment area and policy GAM11 refers to Biodiversity net gain, given the results of the SEA specifically reference Drove Road, we consider that there needs to be specific reference in GAM4 on mitigating the impact of the expansion of businesses on biodiversity habitats/biodiversity net gain.
41. For Drove Road there are specific criteria that must be followed if a development proposal is to be successful. In the supporting text the justification for permitting an increase of 25% of the existing footprint is that put forward by local businesses in the area. Would 25% be suitable for all buildings within the Drove Rd sites? It is unclear whether an assessment has been carried out to confirm this. If development has to follow specific design criteria to be of an appropriate scale (what scale is appropriate?) and integrated into the landscape (how to achieve this). It should be spelt out more clearly within the policy and explained in the supporting text. This will assist a developer to ensure a proposal meets the requirements of this policy and for a development management officer or the Planning Committee at SCDC to determine a planning application against this policy. Would a version of Local Plan Policy E/12: New Employment Development in Villages relating to just the expansion of existing premises on Drove Road be more straightforward or indeed would the Local Plan policy be sufficient? There could be an explanation of what is considered appropriate scale in the supporting text.

GAM5 New employment sites allocations

42. Mill Hill is the only site allocated in GAM5 so this policy could be site specific to Mill Hill. Is Mill Hill to be an Employment site or a Rural Business Development Area? Both terms are used within the policy.
43. Paragraph 4.53 – This mentions that there are two new rural business development areas being allocated in the Plan when within the Policy GAM5 there is only one.
44. We have previously expressed our concerns on the inclusion of the B8 use in the policy wording for both employment policies. This has now been removed from GAM4 but remains in GAM5. Would applications for development of B8 uses be approved on the Mill Hill site regardless of scale or specific location constraints? Without restrictions on the scale of development that would be supported this could result in large sheds and the associated traffic generation. The policy must be clear on what would be supported. Although it has been highlighted to us that such uses already exist on this site this policy criterion would be positively encouraging such a use. If this is the case it could be contrary to the Local Plan Policy E/11: Large Scale Warehousing and Distribution Centres. This is a strategic policy in the Local Plan. This policy would not meet the basic condition test about being in general conformity with the strategic policies in the Local Plan.
45. We continue to have concerns about the way the policy is drafted. It does not restrict the amount of employment use allowed in the Mill Hill area – this is not supported by SCDC. We are not sure what the parish council's vision for this area is and how it is envisaged development would take place. Is it proposed to be piecemeal redevelopment on these sites or a comprehensive scheme? There would be implications for the provision of infrastructure to support such development. We would consider that if this site is to be developed comprehensively there should be a requirement included in the policy for a design framework or brief. A brief would help to shape the future development of the site and would be a useful tool to determine the appropriate capacity of the site identifying the constraints and opportunities of the site, setting out the design parameters for the layout and appearance, exploring improved connections and the impacts on existing infrastructure.
46. There are residential properties including a care home within the boundaries of the Mill Hill area. Whilst recognising that this policy now includes a section that states that any employment proposal has to demonstrate that there will be no adverse impacts on the rural environment and amenity or property of nearby residents, we remain concerned at the potential scale of development that could be allowed by this policy and controlling the amenity impact on nearby residents. We have previously suggested that the parish council should review the extent of what could be allowed by this policy.

Community amenities and facilities

47. We consider that this section would have benefited from having the supporting text for each different policy being with the policy rather than part of a long introduction that includes many issues.

GAM6 Community Facilities

48. We consider that the first part of this policy is not saying anything specific for Gamlingay as it just repeating the Local Plan protecting services and facilities (SC/3) or meeting community needs (SC/4). It is unclear why mention is made here of the support for the creation of additional sports pitches.

GAM7- Designation of former First School buildings, Green End (TL 234647 52413)

49. Map 9 - It would help if Map 9 only included the policies relevant to this part of the Plan. We are unsure what GAM1 Allocated Local Plan Site refers to as this policy does not allocate any sites. Also, open spaces are shown and there is no policy relating to these in the Plan unless these are the ones listed in Appendix 2.

GAM8 Reuse of first school building.

50. We suggest that rather than stating a set period over which the site is safeguarded and could remain empty that the site is safeguarded unless it can be demonstrated that the site has been marketed for a period at a realistic price for educational and community uses, and nothing has been forthcoming.
51. Within the policy the first sentence ends with a collection of letters as examples. (Eg. (a,b,e,f,g)) We are not clear what this means.
52. We have previously suggested that the policy could have as a requirement that a design guide/masterplan be prepared for the site. Such a brief could clarify policies and their application to the site. There may be different interests in the development of the site, and these may sometimes conflict. The preparation of a brief provides an opportunity for such conflicts to be resolved and provide sound urban design principles to the development of the site.

GAM9 Transport provision

53. Does the car parking element of the policy forming the second part of the policy add anything specific for Gamlingay? The Local Plan Policy TI/3: Parking Provision is design led.

54. Second part of the policy – How will a housing development provide ‘enough car parking’ ...within the ‘development envelope’. Enough is not defined anywhere nor is the development envelope. Development should be providing car parking in accordance with the adopted standards unless the Neighbourhood Plan suggests otherwise through robust evidence.
55. There is no evidence or mention in the supporting text to support why level multi use surfaces should be avoided – is this a particular problem in Gamlingay? Context and number of units served should influence the road layout. Shared surfaces streets influence driver behaviour to reduce vehicular speed and improve road safety. We consider that, without supporting evidence, this is overly prescriptive.
56. We also have concerns about this part of the policy from a historic environment perspective. At present, it is framed very rigidly, and we are anxious that it might inadvertently lead to heavily engineered layouts in very small-scale developments, especially small plots leading off the village’s central streets. At present, such developments often do have shared surfaces, and the VDG identifies some developments with shared surfaces as being successful. We consider that this section should be more flexible to avoid unintentional harm to the historic character of the village.

GAM10 Contributions

57. There has been discussions between the Section 106 officer and the parish council about this policy. He considers the principle of asking for contribution fine but that there needs to be a clear idea of what is to be included in the parish improvement plan for cycling etc. There are a number of issues that he considers need to be clarified.
58. Policy GAM10 mentions Map 10 – it is not clear whether the routes shown on this map are planned or existing routes to be improved. It is a map that includes other policies which distract from the cycling routes.
59. It is not clear whether the contributions set out in GAM10 are to be calculated on the gross internal floor area or gross external floor area. Are the contributions to be chargeable on extensions to existing business premises or whether (as currently worded) it is only chargeable on new units. Is there to be an intended floor on contributions (i.e. no contributions are payable where the total payable would be less than say £500?)
60. Clarification is needed as to whether the rates are subject to annual increase in indexation and if so which indexation is to be used. SCDC would suggest that indexation is applied annually from the date the plan is made by reference to BCIS All in Tender.
61. Policy GAM10 requires *contributions of £21 per m² of floor space (for business developments), and £10 per m² of floor space (for housing developments)*. An explanation is needed as to why the housing contribution

is £10 rather than £29 that Appendix 3 would suggest is the most appropriate figure to use. Consideration could be given to reducing the contribution for major developments where in kind works to provide new paths are required.

62. The plan should explain how much money is expected to be generated during the life of the plan, what alternative funding sources may exist and whether there are any particular priority areas in the event that the full amount is not secured.
63. The plan should explain whether there is County Council support for this proposal both in Cambridgeshire and Central Bedfordshire. We would imagine this is a key point to the implementation of the policy.
64. The plan should explain the delivery mechanism for provision of new footpaths, i.e. will this be direct Parish Council commissioning.

4.6 Natural Environment

65. It may help to have the supporting text included in the justification section to be directly linked to the policy placed in the Plan next to the relevant text.

GAM11 Landscape and natural environment

66. The policy has evolved since the pre-submission draft. There is no explanation in the supporting text as to what is meant by the term 'biodiversity metric tool' which is referred to in the first sentence. The examples of biodiversity projects should be included in the supporting text rather than in the policy. It does not create a clear policy for implementing.
67. The first section of this policy refers to key 'wildlife corridors...and a network of green spaces/infrastructure' but the Plan does not provide a map to show where the existing corridors and green network are within the parish. Appendix 2 entitled Gamlingay's green infrastructure does provide lists of different green features but unfortunately these have not been brought together in a map in the Plan. The VDG does show open space on page 14 which could have been included in the Plan to give added weight to protection of corridors. The VDG talks of green fingers of landscape from centre of village to rural edge – these could have been shown in a map in this Plan and thereby helped to protect them.
68. Last sentence of first section of the policy – We consider that the proposed network of green spaces should be for habitat creation and not just for sport and recreation.
69. The second section of the policy - The policy states that only housing and employment developments should not obstruct, or damage valued sites referred to – surely all development should protect these sites? It is not clear in the policy how the green spaces within a development are not to become isolated rather than linked to the wider green network of the parish especially if this is not mapped. How could this policy be implemented without identifying the green sites included in Appendix 2 on a map?

GAM12 Gamlingay Wood

70. Our ecology officer considers that policy should refer to the fact that this wood is an ancient woodland. It is designated as an SSSI because it is an ancient woodland, so this designation is important.
71. The 200m cordon we understand is to allow for countryside uses for those using the woodland. This should be explained more clearly in the supporting text rather than simply stating it is for the enjoyment of future generations but then mentioning in the policy that it is to allow for small scale sustainable construction for the traditional woodland industry. This needs to be explained and evidenced as to why the 200m cordon is chosen as opposed to some other distance.

**SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL
RECORD OF CHIEF OFFICER/HEAD OF SERVICE DECISION**

This form should be used to record key and other decisions made by Chief Officers and Heads of Service. The contact officer will ensure that the signed and completed form is given to Democratic Services as soon as reasonably practicable after the decision has been taken.

A key decision shall not be taken unless notice of the item has been published at least 28 days before the decision is to be taken except where:

- a General Exception notice has been published under Rule 15 of the Access to Information Procedure Rules and the Chairman of Scrutiny and Overview Committee has been informed in writing; or
- where a Special Urgency notice has been published under Rule 16 of those Rules and the Chairman of Scrutiny and Overview Committee has agreed the decision is urgent.

Unless permission has been obtained from the Chairman of Council and the Chairman of the Scrutiny and Overview Committee that a key decision may be treated as a matter of urgency under Rule 12.19 of the Scrutiny and Overview Committee Procedure Rules, any key decision will come into force, and may then be implemented, on the expiry of five working days after the publication of the decision, unless called in under Rule 7 of the Budget and Policy Framework Procedure Rules or Rule 12 of the Scrutiny and Overview Committee Procedure Rules. Where consent has been obtained to exempt the decision from call-in, this will be specified below. Only key decisions of an officer are subject to call-in.

Decision Taker	Lead Cabinet Member for Planning
Subject Matter	Gamlingay Neighbourhood Plan - response to consultation on the submission plan
Ward(s) Affected	Gamlingay
Date Taken	15 November 2021
Contact Officer	Alison Talkington Senior Planning Policy Officer Contact: Alison.Talkington@greatercambridgeplanning.org / 01954 713182 / mobile 07514 926521
Date Published	15 November 2021
Call-In Expiry/Exempt from call-in	
Key Decision?	No
In Forward Plan?	No – delegated decision for Lead Cabinet Member for Planning
Urgent?	Decision must be made by 23 November 2021

Purpose / Background

Purpose

1. The purpose of this report is to agree the Council's response to the public consultation on the submission version of the Gamlingay Neighbourhood Plan. The consultation runs for 8 weeks from 27 September until 23 November 2021.

Background

2. The Gamlingay Neighbourhood Area was designated on 3 February 2015. The neighbourhood area is for the whole parish of Gamlingay.
3. Officers provided informal comments on earlier drafts of the Neighbourhood Plan ahead of the formal pre-submission consultation process and recognise the hard work that those on the steering group of the neighbourhood plan have put into preparing the Plan. This group has strived to ensure that the whole village had an opportunity to have an input into the final Plan.
4. A Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) screening was undertaken on a draft version of the Neighbourhood Plan, and a screening determination was published in September 2019. Following on from this screening which determined that a full SEA was required a SEA was produced in July 2020.
5. Pre-submission public consultation on the draft Neighbourhood Plan was undertaken by the Parish Council from 7 September to 30 October 2020. Officers provided a formal response to the consultation, providing constructive comments about the Neighbourhood Plan to assist the neighbourhood plan group with finalising the Neighbourhood Plan. Officers have met with the steering group to discuss these comments and are aware that the submission version of the plan has not included many changes.
6. On 26 August 2021, Gamlingay Parish Council submitted their Neighbourhood Plan to SCDC. Officers have confirmed, as set out in the Legal Compliance Check for the Neighbourhood Plan that the submitted version of the Neighbourhood Plan and its accompanying supporting documents comply with all the relevant statutory requirements at this stage of plan making.
7. We therefore were able to carry out a consultation on the Gamlingay Neighbourhood Plan from 27 September to 23 November 2021.
8. Officers, in conjunction with Gamlingay Parish Council, are in the process of appointing an independent examiner to consider this Neighbourhood Plan. All comments submitted during the public consultation on the submission version of the Neighbourhood Plan will be provided to the examiner for their consideration.

Considerations

9. The Gamlingay Neighbourhood Plan has been prepared by Gamlingay Parish Council to provide planning policies for development in the area, with the aim of providing greater clarity when determining planning applications in the area. The Neighbourhood Plan includes 12 planning policies that cover a range of issues including:
 - (i) Housing growth including allocating a site
 - (ii) Protecting the local character of the parish

- (iii) Local employment
- (iv) Protecting valued local amenities
- (v) Transport provision on developments encouraging walking, cycling and horse riding.

10. To successfully proceed through its examination to a referendum, a Neighbourhood Plan must meet a number of tests known as the 'Basic Conditions'. These tests are different to the tests of soundness that a Local Plan must meet. The Basic Conditions are set out in national planning guidance and are summarised as follows:
- (a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the Neighbourhood Plan.
 - (b) the making of the Neighbourhood Plan contributes to the achievement of sustainable development.
 - (c) the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area.
 - (d) the making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations; and
 - (e) prescribed conditions are met in relation to the Neighbourhood Plan, including that the making of the neighbourhood plan is not likely to have a significant effect on a European wildlife site or a European offshore marine site either alone or in combination with other plans or projects.
 - (f) the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

Our Neighbourhood Planning Toolkit includes Guidance Note 11 (What are the Basic Conditions and How to Meet Them), which sets out further details on each of the Basic Conditions. When a Neighbourhood Plan is submitted to the local planning authority it must be accompanied by a Basic Conditions Statement that sets out how the Parish Council considers that their Neighbourhood Plan meets the Basic Conditions.

11. When considering a Neighbourhood Plan, the examiner will assess whether or not the Neighbourhood Plan meets the Basic Conditions. When an examiner recommends that the Neighbourhood Plan should proceed to referendum (if it meets the Basic Conditions, with or without modifications), the examiner's report must also set out whether the referendum area should be extended beyond the neighbourhood area. Comments made during the current consultation on the submission version of the Neighbourhood Plan, which will be provided to the examiner for their consideration, should therefore address whether the submitted Neighbourhood Plan meets the Basic Conditions and can also address whether the referendum area should be extended beyond the neighbourhood area.
12. SCDC is fully supportive of Parish Councils bringing forward Neighbourhood Plans for their areas, including Gamlingay Parish Council's decision to prepare a Neighbourhood Plan, and officers have been supporting the Parish Council in the plan's preparation. The Council's proposed response to this public consultation on the submission version of the Neighbourhood Plan is set out in Appendix 1.
13. SCDC is supportive of the aims of the Gamlingay Neighbourhood Plan and our comments are intended to help the Plan to be successful at examination as well as delivering policies that are clear in their meaning and are unambiguous in their interpretation. SCDC

recognise the achievement of Gamlingay PC in reaching this stage of submitting their Plan to us for examination.

14. If the examiner is minded to recommend that the Neighbourhood Plan should proceed to referendum, the Council does not feel that the referendum area needs to be extended beyond the designated Neighbourhood Area as the planning policies included in the plan would not have a substantial, direct or demonstrable impact beyond the parish.

Declaration(s) of Interest

Record below any relevant interest declared by any executive Member consulted or by an officer present in relation to the decision.

None

Dispensation(s)

In respect of any conflict(s) of interest declared above, record below any dispensation(s) granted by the Council's Standards Committee.

None

Consultation

Record below all parties consulted in relation to the decision.

Ward Councillors

Other Options Considered and Reasons for Rejection

The option of not sending a response from SCDC was rejected as this Council has a duty to provide advice and assistance to groups preparing neighbourhood plans.

Final decision

To agree the response from SCDC set out at Appendix 1

Reason(s)

The response is intended to provide the independent examiner with SCDC's comments on the Gamlingay Neighbourhood Plan.

Signed	Name (CAPITALS)	Signature	Date
Lead Cabinet Member (where required by the Constitution)	Cllr Tumi Hawkins		15 November 2021
Chief Officer/Head of Service	Stephen Kelly		15 November 2021

Further Information

Appendix 1: SCDC response to the Gamlingay Submission Neighbourhood Plan

Background documents

[Gamlingay Neighbourhood Plan](#) August 2021

56663

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Mr J Richardson

Agent: Plainview Planning Ltd

Summary:

GAM1

The Plan does not plan positively for housing growth.

The NP policy must be suitably flexibly worded to allow sustainable windfall development to come forward in order to plan positively for housing growth across its lifetime.

The Plan does not make provision for rural exception sites.

A more flexible approach to smaller scale housing sites needs to be included within the Neighbourhood Plan.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4sn>

Representation - <https://cambridge.oc2.uk/a/3v4sy>

56664

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Mr J Richardson

Agent: Plainview Planning Ltd

Summary:

GAM3

Does not agree that development should be restricted in the hamlets - this is not a proactive approach to achieving sustainable development.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4sn>

Representation - <https://cambridge.oc2.uk/a/3v4sy>

56665

Support

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Mr J Richardson

Agent: Plainview Planning Ltd

Summary:

GAM 6

Support need for additional outdoor space in Gamlingay.

the Plan is not flexible to allow for new sports facilities

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4sn>

Representation - <https://cambridge.oc2.uk/a/3v4sy>

56666

Object

Supporting Documents, Gamlingay Neighbourhood Plan

Respondent: Mr J Richardson

Agent: Plainview Planning Ltd

Summary:

Considers the evidence base supporting the Plan is not up to date.

Attachments: Representation - <https://cambridge.oc2.uk/a/3v4sn>

Representation - <https://cambridge.oc2.uk/a/3v4sy>

Summary of representations:

-

Summary of representation changes to plan:

-

Response:

-

Action:

-

FAO Neighbourhood Planning Team, Greater Cambridge Planning

neighbourhood.planning@greatercambridgeplanning.org

**James Dorey
Plainview Planning**The Malt House
Cowley
GL53 9NJ[REDACTED]
Our Ref:/3004/CHJD**22nd November 2021***Via Email*

Dear Sir/Madam

Gamlingay Neighbourhood Plan Representations**Introduction**

1. This statement has been prepared by Plainview Planning on behalf of [REDACTED]. It sets out representations to the draft Gamlingay Neighbourhood Plan which was published for consultation until 5pm on Tuesday 23rd November.
2. These representations seek to ensure that the Gamlingay Neighbourhood Plan, in reference to national and local guidance, meets the basic conditions as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and meets the National Planning Policy Framework (‘the Framework’) requirements in being positively prepared and in “...general conformity with the strategic policies of the Local Plan” (para. 184, the Framework).
3. [REDACTED] is promoting a site on the north of Cinques Road and has an active interest in an effective and policy compliant neighbourhood plan for Gamlingay.
4. We generally support the objectives of the Draft Gamlingay Neighbourhood Plan but wish to make the following constructive objections to ensure that the plan achieves the best outcome for the village and accords with the Basic Conditions that require the Plan to have regard to the NPPF and to conform with the strategic policies in the Development Plan.



5. Our key representations cover:

Introduction	0
Procedure for Neighbourhood Planning	1
Objective 1 - Housing Growth/Policy GAM 1	2
Objective 2 - Local Character/GAM 3	4
Objective 4 - Community Amenities and Facilities/GAM 6	5
Evidence Base	7
Conclusion	7

Procedure for Neighbourhood Planning

6. Provision for Neighbourhood Planning is made within the 2011 Localism Act which empowers local communities to develop a shared vision for their neighbourhood and deliver the sustainable development they need through planning policies relating to development and the use of land.
7. The National Planning Policy Framework (NPPF) (2021) provides guidance on the preparation of Neighbourhood Plans at paragraph 29-30 and associated footnote 18 which state that:
- a. *"29. Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies (18).*
 - b. *(18) Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area."*
8. The Planning Practice Guidance (NPPG) to the NPPF further clarifies the role of Neighbourhood Plans in supporting strategic development needs and planning positively.

Basic Conditions

9. A Neighbourhood Plan needs to meet the 'basic conditions' set out in Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and summarised in Paragraph ID41-065-20140306 of the PPG. The basic conditions are:
- a. **(a)** *It must have regard to national policies and advice in the form of the NPPF. The PPG is clear that Neighbourhood Plans should support the strategic development needs set out in Local Plans and that they should not promote less development than these.*



- b. **(b)** *having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses.*
- c. **(c)** *having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area.*
- d. **(d)** *It must contribute towards the achievement of sustainable development. The PPG emphasises that the plan must contribute to improvements in environmental, economic and social conditions, and show how any adverse impacts have been prevented, reduced or offset.*
- e. **(e)** *It must be in general conformity with the strategic policies contained in the development plan for the area of the authority.*
- f. **(f)** *It does not breach EU obligations such as Strategic Environmental Assessment, Environmental Impact Assessment and Habitats and Wild Birds Directives.*
- g. **(g)** *It meets prescribed conditions such as it should not have a significant effect on a European site.*

Objective 1 - Housing Growth/Policy GAM 1

10. At page 7, Objective 1 sets out that the NP is supportive of new housing growth particularly the support for small scale 1-2 bed units.
11. This is reflective of some of the key findings of the parish survey; such as an appetite for the village to be described as 'affordable' and the provision of small housing developments (less than 10 dwellings, individual plots and a mixture of small/medium developments 10-25).
12. Only x sites have been allocated for housing development within the local plan. Even if further sites are not to be allocated for housing development, further flexibility should be provided for housing and affordable housing within the NP area in order to provide suitable levels of flexibility during the life of the plan. Without this we consider that the NP fails the basic conditions a and d.
13. GAM1 and supporting text at 4.23 note that Gamlingay will **plan positively for housing growth** across the lifetime of the NP - up to 2035. However, para 4.23 also states that housing sites must fall within the development framework with reference to GAM 3.
14. Whilst there is no requirement for the NP to bring forward further sites for development for the period 2025-2035 (ref paragraph 4.25) it is also relevant that meeting a 5 year housing land supply should not be considered as a cap to further development (Gladman Development Limited v Secretary of State for Housing and Communities and Local Government and Sedgemoor District Council [2019]). Given this, the **NP policy must be suitably flexibly worded to allow sustainable windfall development to come forward in order to plan positively for housing growth across its lifetime.**



15. Paragraph 4.10 notes that Gamlingay's share of the SCLP windfall allowance has been provided and the remainder of the plan remains silent on windfall. We note SCLP policy S/9 and supporting text which discusses larger windfall development with maximum scheme size of up to 30 dwellings as an upper level likely to be suitable. It does not rule out smaller windfall sites from coming forward and nor does it cap the total amount of housing development for the minor rural centres at 30 additional dwellings- using the wording 'likely to be suitable', rather than the NP wording at paragraph 4.9 which states this as a maximum figure set down by the SCLP. **This is not correct and should be amended.**
16. Given this, the supporting text at paragraph 4.23 should be amended as follows (text in **bold** and *italics* denotes new suggested text):

4.23 Gamlingay will plan positively for housing growth across the lifetime of the Neighbourhood Plan (2020-35). Housing sites ~~must~~ **should predominantly** fall within the development framework (see GAM3). ***These, and sites proposed for development with reference SDLP Policy H/11 and windfall sites*** ~~They~~ will be considered carefully and will be acceptable only where they reflect the principles of affordability, sustainability and adaptability outlined above, and are consistent with the Neighbourhood Plan (policies) taken as a whole. For clarification all hamlets are classified outside the Village Framework, as located in the open countryside.

Paragraph 4.14

17. The NP does not make provision for rural exception sites, instead concluding at paragraph 4.14 that there is no anticipated requirement for housing exception sites during the lifetime of the neighbourhood plan - subject to review every 5 years. **We cannot see how it is possible to conclude this over a 15 year period.** It is relevant that the Greater Cambridgeshire Plan is emerging and sufficient flexibility needs to be built into the NP to enable it to respond to that plan.
18. It is relevant that the first draft Greater Cambridgeshire Local Plan First Proposals expect about 5,300 homes to be built during the plan period from windfall sites. On top of that, new allocations totalling 11,640 homes are going to be needed.
19. A lack of policy in relation to windfall sites and lack of allowance for rural exception sites does not allow sufficient flexibility to adapt to change and increased housing need. No does not accord with National Planning Policy which allows for development beyond settlement boundaries in situations other than being linked to a rural business. For example through rural and entry level exception sites. This is set out in paragraphs 72 and 78 of the NPPF.
20. Paragraph 72 allows for entry-level exception sites suitable for first time buyers (or those looking to rent their first home) on sites not already allocated for housing and adjacent to



existing settlements. Provision of such sites would also support the Neighbourhood Plan's objective to provide affordable homes for new people. Paragraph 78 allows for rural exception sites which secures affordable housing in perpetuity on sites not normally used for housing - beyond the settlement boundary.

21. Provision of such sites is especially important in Gamlingay where it has been identified at Objective 1 that Gamlingay already has plenty of large and expensive homes. What is needed are small affordable and adaptable homes. 1-2 bed dwellings and bungalows are highlighted as being in need. This is also reflected by the needs of the aging population to down size and by residents who noted that an aim of the NP is for the village to be affordable.
22. Therefore provision for the ability of suitable sites as exceptions to development beyond settlement boundaries, is essential to meet both the likely uplift in housing needs and specific identified needs for those who would benefit from affordable housing options.
23. Setting such a restrictive approach to non allocated housing development is not in accordance with the government's intention to 'significantly boost' the supply of housing and does not take into consideration certain exceptions criteria which would assist in meeting identified local housing needs. **Therefore a more flexible approach to smaller scale housing sites needs to be included within the Neighbourhood Plan as this "blanket ban" is not in accordance with basic conditions (a) and (d) at this time.**
24. Given this, the last sentence of the supporting text at paragraph 4.14 and 4.15 should be amended as follows (text in **bold** and *italics* denotes new suggested text):

4.14 ***There is currently no anticipated need for housing exception sites during the first five years of the plan period. However, each case will be reviewed on its merits with reference to evidenced need in recognition of Objective 1.***

4.15 ***Each case will be considered on its own merits with reference to wider development plan policy and needs at the time of consideration.***

Objective 2 - Local Character/GAM 3

25. GAM 3 notes that Housing will be located within the boundary of Gamlingay village to preserve the visual quality of the landscape. Policy GAM3 is explicit that the hamlets in the parish are not suitable locations for exception sites.
26. The policy is not positively worded and nor does it address how other forms of development will be considered in these areas. This links to aspects lacking in Objective 4 and policy GAM 6 discussed at paragraph 39 onward below.



27. This is a totally inflexible position which doesn't allow for the villages to respond to change within the plan period. It assumes that **all** development will undermine the aims of policy in relation to local character and the countryside. It doesn't reflect that a small scheme wouldn't necessarily undermine the aims. The policy should provide sufficiently flexible guidance in order that each scheme may be considered on its own merits.
28. What clearly comes across is how fearful the community is of speculative development resulting in the erosion of the gaps between the hamlets and the village. This is evidenced by Table 2 of the NP where 250 residents consider keeping/adding green spaces as 'Essential' and 277 residents consider protecting open countryside as 'Essential'.
29. The NP response is to designate these areas as 'settlement gap'. However, the landscape is not designated in any other way and in times of housing need this alone may not be sufficient to protect land from development - this was borne out in the decision made in relation to 9 self build dwellings on Heath road, referenced at paragraph 4.35 of the plan.
30. That appeal decision noted that low density development, the siting of the dwellings and enhanced landscaping that would be secured by planning conditions, would ensure a sympathetic transition between urban and rural areas and no significant visual effect to the open countryside. It is also noted in that decision that a substantial area of open land would remain between the two settlements which the Inspector considered would continue to serve the purpose of keeping Gamlingay and the nearby hamlets physically separate.
31. The Local Plan remains silent in relation to self build as was the case in relation to the above appeal. The self and custom build register published by SCDC shows 481 people on the register with no permissions granted for self build in the 3 years following each of the last 3 base periods. Given this, it seems that the parish may still be vulnerable to speculative development for housing where a need can be evidenced and the LP is silent.
32. Setting down this blanket restriction in NP policy seeking to prevent exceptions housing at the hamlets obviously aims to provide another 'layer' of policy protection to the 'settlement gaps'. However, this is not a proactive approach to achieving sustainable development and this settlement gap protection was overcome by the benefit that would result from provision of a tenure of housing in short supply.
33. Another approach to safeguard this land and to demonstrate that Gamlingay has done all it can to proactively support growth, would be to consider as with the Heath Road Site, whether some of this land could provide for some form of development to meet identified local need, whilst not undermining the character of the landscape.
34. This could include proposals for community amenities/facilities and public green space in response to the 250 respondents referenced at paragraph 27 above. Encouraging these or setting down in policy that uses such as these within the settlement gaps will be encouraged



would provide another layer of protection (given the protection afforded at policy SC/3, SC/8 of the LP and policy within the NP) and a sustainable approach to cater for growth and increasing support for community facilities in the area.

35. Development of this nature need not undermine the aims to protect the open countryside and landscape setting and as discussed in the relevant section below, and development of these sites could meet a need within the community. The fourth sentence of paragraph 4.32 should be reworded to acknowledge that not all forms of development will be harmful as follows:

4.32It will be protected from development **that results in erosion of the settlement gap or encroachment into the countryside or significant visual effect to the open countryside** ~~in order to safeguard the open countryside between the hamlets and the village from further encroachment~~ (see paragraph 4.10), thereby preserving the visual qualities of the landscape and maintaining the separate identity of the hamlets. Policy GAM11 protects views and vistas identified in the Village Design Guide. A landscape and visual assessment of the settlement character of the parish and its landscape setting commissioned for the Neighbourhood Plan identified two additional views included in this Plan. To aid developers, the maps identify 7 key views to and from the village (indicated by <-> arrows) which the Plan seeks to preserve from development **which negatively impacts these views**; these are listed and illustrated in Appendix 2.

36. The third sentence of paragraph 4.38 should also be amended to reflect comments made in both this and the preceding section as follows:

4.38 ...Development of new homes (including self-build) ~~must~~ **should predominantly** take place within the village framework. **Proposals for sites made with reference to SCLP policy H/11 will be carefully considered to ensure development does not unduly erode the settlement gap** in order to protect the integrity of Gamlingay's radial village with satellite hamlets and smallholdings. ~~The hamlets are not suitable locations for exception sites.~~

37. The second bullet point of policy GAM3 should also be amended as follows:

- Housing will **predominantly** be located within the boundary of Gamlingay village (its development framework) to prevent the village, the hamlets and smallholdings from joining up, to preserve the visual quality of the landscape and retain the separate identities of the settlements. Particular emphasis is placed on the settlement gap between Cinques, Dennis Green and Little Heath identified in the Policies Map (legend shows 'village character GAM 3', on maps 4 and 7). New development **in**



these locations should preserve key views to and from the village (see maps 4 and 7). ~~The hamlets in the parish are not suitable locations for exception sites.~~

Objective 4 - Community Amenities and Facilities/GAM 6

38. A common theme from the parishioners within the 2016 survey responses and subsequent NP engagement is that they are concerned that additional built development within Gamlingay and its surrounding area will increase pressure on existing facilities and public open spaces. Survey results also suggest that additional outdoor facilities would be welcomed as part of the village.
39. This need for additional outdoor space is demonstrated by the Joint Strategic Needs Assessment and the Public Health Profile for Cambridgeshire which finds that there is an aging population, which will continue to increase. It notes that levels of physical activity are lower than average and the mental health of residents is a key concern.
40. NP Objective 4 notes that the NP will give local people the opportunity to say what development they want and where, this would appear to have been reflected by GAM 6 which seeks to secure contributions to the provision of new infrastructure for walking, cycling and horse riding. It also notes that applications for the creation of additional sports pitches will be supported.
41. We strongly support the proposed policy gateway for the provision of additional sports pitches.
42. In terms of public open space, the first school field is proposed to be designated as Local Green Space GAM 7 as part of the NP. It is noted that this will help to address the deficit of green space on the west side of the village and protect a much-loved asset. This is also proposed with the aim of preventing future built development on the site which would lead to the loss of the Green Space. Whilst this may secure it for the short term, it provides no long term guarantee that it will remain undeveloped. A community land trust or similar means of the community owning the land would provide a more robust long term option.
43. We do not consider that the NP has reviewed the surrounding parcels of land sufficiently to establish if other green spaces could be protected and brought forward as community assets to provide further community amenities/facilities and public green space. This in turn could help to resolve the acknowledged deficit of green space to the west of the village.
44. Whilst there is support for new sports facilities, we feel that the NP could have gone further to understand the need for community amenities/facilities inclusive of sports facilities and particularly public green space as is suggested by 9.4 of the LP, in order that these sites could have been appropriately searched for, secured and provided for as part of the NP.



45. This could have doubled as an opportunity to secure appropriate open land between Gamlingay and its surrounding satellite hamlets to ease residents concerns about future development of open land and provide balanced community facilities in line with Paragraph 101 NPPF - *“The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.”*
46. Unless the NP is pushed back to the Steering group for further work, other Local Green Space sites cannot be secured and protected from other development until the next NP review in circa 5 years time.
47. Because of this we do not consider that the Plan in its current form complies with the following basic condition:
- a. (d) It must contribute towards the achievement of sustainable development. The PPG emphasises that the plan must contribute to improvements in environmental, economic and social conditions, and show how any adverse impacts have been prevented, reduced or offset.

Evidence Base

48. We would note that the parish survey was prepared and issued to residents in October 2016. This evidence base is over 5 years old. Public consultation has taken place, however no updated focused survey has been carried out since 2016. The survey is no longer reflective of the current population given that the village has grown from 3,568 in 2011 (census) to circa 5000 today. It is therefore unlikely that the survey's results are reflective of residents' needs/thoughts.
49. The older a NP and its evidence base gets the more open it is to challenge as other material considerations start to be given greater weight. The PPG 084 Reference ID: 41-084-20190509 notes that in order to reduce the likelihood of a neighbourhood plan becoming out of date, communities preparing a NP should take account of the latest up-to-date evidence base. Based on the above, we think the NP should be informed by a more recent parish survey.

Conclusion

50. We do not consider that the Plan in its current form complies with the following basic conditions:
- (a) regarding national policies and advice in the form of the NPPF;



(d) contributing towards the achievement of sustainable development.

51. As detailed through these submissions, we suggest that greater flexibility must now be built into the Neighbourhood Plan proposals. Should the Neighbourhood Plan proceed and fail to plan for this flexibility, there is a real risk that its proposals will need to be reviewed again prior to the next 5 year period in order to remain an up-to-date part of the Development Plan for the parish.



Gamlingay Neighbourhood Plan



Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or neighbourhood.planning@greatercambridgeplanning.org

All comments **must** be received by 5pm on Tuesday 23 November 2021.

Data Protection

We will treat your data in accordance with our Privacy Notices:

www.scambs.gov.uk/planning-policy-privacy-notice/. Information will be used by South Cambridgeshire District Council solely in relation to the Gamlingay Neighbourhood Plan. Please note that all responses will be available for public inspection and cannot be treated as confidential. Representations, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed of future stages of the Gamlingay Neighbourhood Plan?

Please tick: Yes **No**

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:	██████████	Agent's name:	James Dorey
Name of organisation: (if applicable)		Name of Agent's organisation: (if applicable)	Plainview Planning
Address:	C/O Agent	Agent's Address:	The Malt House, Cowley, Cheltenham
Postcode:	C/O Agent	Postcode:	GL53 9NJ
Email:	C/O Agent	Email:	██████████
Telephone:	C/O Agent	Telephone:	██████████
Signature:		Date:	23/11/2021

If you are submitting the form electronically, no signature is required.

For office use only

Agent number:

Representor number:

Representation number:

Part B – Your Response

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

Policy or Paragraph Number (please state)	Please see the accompanying letter from Catherine at Plainview Planning
Do you Support, Object or have Comments? (Please tick)	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Object <input checked="" 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.

Please see the accompanying letter from James at Plainview Planning

Summary of Comments:

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

Please see the accompanying letter from James at Plainview Planning

Completed forms must be received by 5pm on 23 November 2021 at:

Email: neighbourhood.planning@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team South Cambridgeshire District Council,
Cambourne Business Park, Cambourne,
Cambridge, CB23 6EA