

Cambridge City Council response to South Newnham Neighbourhood Plan consultation – July 2023

1. Thank you for consulting Cambridge City Council (CCC) on the draft South Newnham Neighbourhood Plan. This response represents our formal comments on the pre-submission consultation.
2. We have concentrated on the planning policies as, ultimately, they are the elements that will be used to determine planning applications and must meet the Basic Conditions. We raise a number of comments in relation to policies and are happy to undertake further dialogue with the Neighbourhood Forum should you so wish.
3. We note in the Foreword, there is reference to consultation with those living and working in the community, with the Neighbourhood Plan policies reflecting the views of the majority of the South Newnham residents. There appears to be no clear reference to consultation with businesses. This is a requirement of the process, so should be addressed. Although in Section 4, reference has been made to local shops and businesses, it is still suggested that clear reference to consultation with businesses is added to the Foreword.
4. We also remind you that, should you feel it is necessary to make substantive changes to the draft Plan in response to comments received, it may be appropriate to consult again at this stage prior to formally submitting it and the other required documents to the City Council.

Responsibility for the Plan

5. The front cover of your Neighbourhood Plan shows the Plan was prepared by South Newnham Neighbourhood Forum (SNNF) as the ‘qualifying body’ to carry out a Neighbourhood Plan. It would also be helpful if the version of the plan was on the cover. For example, the next version of the Plan to be submitted to CCC should say “Submission Plan”.
6. Paragraph 2.7 may need expanding to reference, that once adopted, the Neighbourhood Plan will form part of the Development Plan.

Maps and Figures

7. The content of most of the maps is comprehensive with references to the Neighbourhood Plan's policies or community actions, the conservation areas, green infrastructure networks and local green spaces. Some of the maps however, are formatted at a small scale/size resulting in poor quality and legibility. It is suggested that the maps are produced at a high resolution with some map benefitting from being split into more than one map. These have been identified in the relevant sections of the draft Plan.

How has the Plan responded to previous comments?

8. We previously made comments on an earlier draft Plan in November 2022, followed by a meeting to discuss our suggestions. Comparing the two documents, it is clear that this version of the Plan has positively responded to our suggestions including revising the policy sections with reformatted policy wording, community actions and supporting text.

Cambridge City Council comments on the pre-submission draft Neighbourhood Plan

9. The following comments are made in response to the pre-submission draft of the Neighbourhood Plan. Various officers from the Greater Cambridge Shared Planning service, and Cambridge City Council have contributed to the comments. To assist, we refer to the paragraph numbers in your draft Plan.
10. The comments are split into sections with matters under whether the draft Plan meets the Basic Conditions, and then a separate schedule of matters that you may like to consider in preparing the submission version of the Plan.

Comments relating to whether the Neighbourhood Plan's Policies will pass the Basic Conditions

11. The below comments are focussed upon whether the Neighbourhood Plan's policies pass the test of the Basic Conditions. Some of the comments have been written to help the Neighbourhood Forum refine the policies so that the Plan can pass examination and become adopted.

Neighbourhood Plan Development Policies

12. In Paragraph 6.1, it is queried whether the Greater Cambridge Landscape Character Assessment 2021 and Cambridge City Council Tree Strategy has been included in the document review.

Policies for South Newnham

13. Throughout the policies and supporting text of the Neighbourhood Plan, it is suggested where possible to use the wording 'shall' rather than 'should' for the wording to hold material weight. An example of this would be amending wording in SNNP1 from 'the hierarchy of mitigation should be applied to all proposals by implementing [...]' to read: 'the hierarchy of mitigation shall be applied to all proposals by implementing [...]'.

Policy SNNP1 Protecting and Enhancing Biodiversity

14. The policy is detailed in ensuring the protection and enhancement of biodiversity within the local area. It is recommended that the policy wording is reduced to simply identify the areas of importance, with the further details expanded upon within the supporting text of the policy.
15. The policy is directed at 'development proposals' which is too broad. The policy needs to be clear with reference to which development proposals as not all development types will be required to protect or enhance biodiversity. It is suggested that wording is amended to include minor developments upwards.
16. It is not clear how some elements of the policy such as 'increase tree canopy coverage' can be achieved. This was also raised in comments shared with the Neighbourhood Forum in November 2022. It is suggested that if this is kept in the policy, reference should be made to the Cambridge City Council Tree Strategy SPD that highlights a need to increase tree canopy cover across Cambridge from 17% to 19% by 2030.
17. In Policy SNNP1 in wording under 1. i), the term 'ancient' in the description of important hedgerows has no real material weight. It is recommended that the sentence is amended to read: 'Species rich and protected hedgerows along [...]'. Protected hedgerows are defined within the National guidance and legislation, whereas the descriptor of ancient is not.
18. In Policy SNNP1 in wording under 6., it is recommended that the wording is amended to read: 'Species rich and protected hedgerows [...]' to be consistent with amendments suggested above. Alternatively, if there is a locally important reason that does not fit within National legislation criteria, then using the prefix of 'locally' will be a critical part of this definition.
19. In Policy SNNP1 in wording under 6., on hierarchy and delivery of enhancement of hedgerows at Granchester Road, Gough Way, and King's Road. It would be expected that this approach would apply in all areas of site layout and design. It is therefore recommended that these areas form a new

paragraph/point, or that Granchester Road, Gough Way and King's Road are removed from the heading so that the protection applies in all areas.

20. In Policy SNNP1 in wording under 7., mention is again made to impact on hedgerows which are already covered in point 1 and point 6. It is suggested that the wording is amended to read: 'Development should avoid severance of bat flight lines to [...]']'.
21. Paragraph 7.1.3, it is suggested that the three links to external guidance documents are removed. The referenced documents could go out of date, particularly the draft Biodiversity Strategy. The draft Neighbourhood Plan itself along with the evidence base documents should cover off the protection and improvement of the biodiversity in the green infrastructure network.
22. Paragraph 7.1.3, it is recommended that the heading 'Species rich and important hedgerows in the River Corridor' is amended to read: 'Species rich and protected hedgerows in the River Corridor'.
23. Paragraph 7.1.3, it is suggested that the description of 'ancient' hedges is removed as this is not a legislative descriptor of hedges.
24. Reference is made to 'Policy Map 2', but the Map appears to be 'Map 2'. The naming of maps throughout the draft Plan needs to be consistent to avoid doubt for the end user. For the sites annotated on the maps it is recommended referencing the numbers in the policy to enable matching up of sites to the map.
25. Map 2 is also difficult to read in terms of defining boundaries and its legibility. It may be better if the map was on one page and the key on a separate facing page. This would allow for the map to be larger in size and improve readability.
26. It is difficult to differentiate between the differing colours of green in Map 2, especially between Private Gardens and Green Corridors despite it seeming obvious. It is recommended that one or the other is made of different colour or hatched to accompany the colour.

Policy SNNP2 Delivering Biodiversity Net Gain

27. Some of the proposed biodiversity policies reflect existing NPPF and adopted Local Plan policies. It is suggested that wording is amended to reflect that development shall meet and deliver BNG in accordance with national and local policy. Although the sites have either statutory or non-statutory designation for the Local Plan Policy 69, it is important to consider the direction of policy in the emerging Local Plan and proposal for 20% BNG.

28. It is recommended that the mitigation hierarchy is referenced but does not need to be repeated.
29. Paragraph 7.1.5 does not set out when information is required in the development process. It is suggested that wording is amended to read: 'All development proposals (except householder applications – see below) must provide clear and robust evidence at *X stage of development process*, setting out [...]’.
30. The policy also omits other forms of development e.g., small sites, self-build, custom housing or de minimis applications that may be exempt from the Environment Act Requirement but not from this policy. It is suggested that differentiation is added alongside householder applications.
31. In Policy SNNP2, under c), the policy specifies on-site and does not mention that off-site habitats are also suitable.
32. The final paragraph of Policy SNNP2 could be reworded to make it clearer to users. For example, it is not clear what the ‘development proposals’ stage is? It is suggested that wording ‘will be expected to take opportunities that become available [...] is replaced with ‘should take opportunities [...]’.

Policy SNNP3 Reduce and maintain low levels of light pollution

33. Policy SNNP3 refers to Guidance Note 8. It is suggested that the links to external guidance documents are removed. The referenced documents could go out of date, so it is recommended that the policy refers to demonstrating Guidance Note 8 is followed, or future versions of the guidance.
34. Policy SNNP3 references the use of shielded yellow/orange lights rather than unshielded white lights. Guidance Note 8 advises that yellow (sodium) or orange lights which are mainly for street lighting are being gradually phased out.
35. It is suggested that where development proposals require planning permission and external lighting is required, it should include information about layout and beam orientation, a schedule of the light equipment proposed including luminaire type, mounting height, aiming angles and lumen unit levels. For example, additional wording to read: ‘New lighting should be designed such that lighting is a) directed downwards to avoid spill up into the sky or out of the site, b) it is the minimum required taking into account public safety and crime prevention, c) it should avoid light spillage beyond the area intended to be lit, d) it minimises the impact to wildlife and landscape character, particularly at sites on the edge of Cambridge’

36. To support Policy SNNP3, is there a potential to map the 'dark' routes for reducing and maintaining low levels of light pollution?

Policy SNNP4 Creating Local Green Spaces

37. It is suggested that the policy title should be amended to read: 'Protecting and Enhancing Local Green Spaces' as they are already in existence there.
38. It should be considered whether there is a need to 'designate' green areas for special protection in the draft Plan as there is already protection in the adopted Local Plan.
39. In paragraph 7.2.3 it is proposed to treat four LGS 'to offer the same level of protection as the Green Belt'. The majority of LGS 2 is in the Greenbelt though a small part at the beginning of the footpath is undesignated so establishing this space as an LGS seems appropriate. LGS 3 is already in the Greenbelt.
40. LGS 1 and LGS 4 are designated as Protected Open Space in the adopted Local Plan, as well as a City Wildlife site, but are not in the Green Belt.
41. For LGS 6 to LGS 9 it is suggested that the policy clarifies who has maintenance responsibility for these areas. In some cases, this may be the City Council, the Highway Authority or a private management company. Their requirements for maintenance may override the neighbourhood plans wishes, particularly the Highway Authority.
42. Reference to the Riverside Club for naturist swimming is not mentioned within this policy although it is a green space along the river.
43. The formally designated LGS in Policy SNNP 4 and Appendix C are numbered in the same way to the way to the green spaces in the Community Aspirations – suggest changing this to make them more clearly differentiated.

Policy SNNP5 Protecting and Maintaining the Connectivity Network

44. Policy SNNP5 states that 'all proposals should give priority to the safety of pedestrians'. It is suggested that the policy should be expanded to non-motorised users, including wheelchair and other disabled users, and therefore amended wording could read: 'all proposals should be designed to prioritise pedestrian movements to create safe and attractive routes that promote inclusivity'. It is also noted that not all proposals, for example those within an existing site will have an impact on pedestrian routes. The statement could be amended to include reference to 'as appropriate to the development'.

45. Policy SNNP5 sets out alleyways as designations in the connectivity network. It is important to distinguish the status of a number of these alleyways that are privately owned. Therefore, it is suggested that the wording is amended to read: 'The Connectivity Network, comprising footpaths, publically accessible alleyways, lanes [...]'. To mitigate concerns regarding character of these alleyways when resurfacing, the policy could reinforce that insensitive resurfacing could be harmful to maintaining the character of the area including the alleyways.
46. It would be beneficial for Policy SNNP5 to recognise the role that good walking and cycling networks have in supporting active travel options and improving health and wellbeing. The policy could make reference to the modal user hierarchy identified in Manual for Streets 1 (Table 3.2) as a way of establishing intent in decision making.
47. It is believed that the Barton Road Cycle Path in the Neighbourhood Area is all within highways and would not require planning consent. It is therefore not appropriate to include it in the policy.
48. For bullet point three of the Barton Road Cycle Path, it is recommended that instead of saying 'no black tarmac', it should say, 'for example, tarmac may be considered less favourably'. There may be options to which black tarmac may be appropriate.
49. In paragraph 7.3.3, it is also suggested that wording referring to black tarmac should be amended to change the tone towards tarmac use. The emphasis could be on the use of contextually appropriate materials, which avoid the loss of rural edge character and the unbound lanes of the Victorian styles. Elsewhere a heritage asphalt surface with river gravels may be appropriate and can provide a less 'black top' type finish.
50. For J1, it is recommended that wording of the 'dangerous junction' is re-considered. Is this wording supported by transport studies? It is suggested that it should follow similar wording to J2 that 'support improvements to make this junction safer for'.
51. In paragraph 6.3.4 under SNCA8, it is suggested to amend wording to read: 'We will seek pedestrian Rights of Way status for alleyways, lanes, and footpaths. *If and where possible, we will seek to have this status assigned for those routes which are not currently designated any statutory protection*'.
52. On Map 3, L1 and C1 are not identified.

Policy SNNP6 Improving and Enhancing Community Assets

53. The wording in Policy SNNP6 is not clear where it reads 'provided that they do not have a harmful effect on the street scene, or views of trees and gardens'. What constitutes a harmful effect on the views of trees and gardens? It is suggested that clarification is made through amendments to the wording.
54. The policy should consider the leisure facilities, such as Lammas land pool as enhancing the accessibility for children, including those with disabilities and their guardians.

Policy SNNP7 Protecting and Supporting Homes and Facilities for Older People

55. The policy is headed 'Protecting and Supporting Homes and Facilities for Older people', but the policy itself goes on to talk about 'older and disabled people'. The policy should consider the needs of disabled people. Disability can affect people of any age, and include a wide range of disabilities, including physical and learning disabilities, mental health issues and autism. The document 'Protecting and Supporting Homes and Facilities for Older people' also refers to relevant information regarding the needs of disabled people. This may also be particularly relevant to other policies including Policy SNNP6 and SNNP8. This could note that a lot of the pavements and paths are unsuitable for disabled people and could be enhanced in future.
56. Policy SNNP7 states that development proposals will be encouraged; it should be clear that any proposals should be based on clear evidence of need.
57. The policy refers to 'development' proposals but then goes on to say that the façade should not change, which suggests it may only be referring to re-development. This should be clarified. Reasons behind the requirement not to change the façade would also benefit from some explanation. For example, would it prohibit external painting or installing new windows or doors as part of the work? There may also be circumstances where the façade could be improved; for example, to fit better with the surroundings, or where it is necessary to provide a more appropriate facility to meet the needs of residents, or to provide higher levels of energy efficiency.
58. The statement around resisting proposals to change the use of Lammas Court to 'privately owned' is very specific, and it's not clear why ownership (private or public) is relevant here. Planning permission would not be required to sell the property to private companies to run it and so should be removed from the policy. If the intention is to protect it as accommodation for older people, you might also want to give consideration to resisting change of use to other forms of residential accommodation, rather than just non-residential.

59. Again, circumstances where change of use for Lammas Court may be allowed should include where there is insufficient evidence of need.
60. The map is hard to read – would it be better suited split it into more maps? It would also be helpful to have a map showing the location of Lammas Court.

Policy SNNP8 Conserving Additionally identified Local Heritage Assets

61. Policy SNNP8 refers to gas lamps on Millington Road and South Green Road as additionally identified Local Heritage Assets. Those items listed in H4 Gas Lamps on Millington Road and South Green Road are listed Grade II. Those particular items included within policy SNNP8 are protected as Listed Heritage Assets. Item H8 Gonville & Caius College cricket pavilion, Clare Road is locally listed.
62. To bring paragraph 7.6.2 more in line with paragraph 203 of the NPPF, it is suggested to add words ‘adverse’ and ‘any’, to read ‘Where proposals have any adverse effect on a non-designated heritage asset (those listed in this policy and those already identified by Cambridge City Council), a balanced judgement will be applied having regard to the scale of any harm and the significance of the heritage asset’.
63. It is recommended to double check the content of the list of existing Listed Buildings and Buildings of Local Interest in paragraph 7.6.3. From a quick search of the Buildings of Local Interest lists it seems that No. 88 was not listed, and No. 51 is missing from BL2. No. 11 was missing from BL10. From the Buildings of Local Interests list, did you want to include Nos. 1-12 Croft Gardens? Any amendments will need to be reflected in paragraph 7.6.1.
64. It is not possible to accurately identify which properties are designated on Map 5 and there are no accompanying detailed maps either in the appendix or in the evidence document. Detailed maps specifically identifying the location and extent of the designated asset should be included in the Plan.

Policy SNNP9 Improving the Energy Efficiency of Existing and New Buildings

65. The sentence which is immediately below Action 2.8 in paragraph 7.7.1, starts ‘Policy SNNP8 complements the approach taken at the Cambridge City level’. The wording should be amended from ‘SNNP8’ to ‘SNNP9’ as the sentence relates to policy SNNP9.
66. The general approach in SNNP9 is broadly consistent with the approach taken in the adopted Local Plan. It would be helpful for paragraph 7.7.3 to reference the Greater Cambridge Sustainable Design and Construction SPD.

67. Paragraph 7.7.3 is unclear on where the requirements on preparing the Sustainability Statement have come from, in particular the bullet point related to renewable energy generation, which quotes a figure of 120 kWh/m²fp/year as this does not relate to adopted Local Plan policy. Further clarity is therefore requested in terms of the origins and evidence to support this requirement and the space heating demand and energy use intensity requirements which do not set specific targets in terms of how applicants would be required to demonstrate compliance with this approach. While some of these requirements are related to the emerging Greater Cambridge Local Plan, as this has not yet been subject to examination, we would query the extent to which these can be required through a Neighbourhood Plan. It would also be very difficult to implement the more general references to space heat demand and energy use intensity in the absence of actual targets for these.
68. It is also questioned whether a sustainability statement is required for extensions? It is recommended that the policy wording 'will be proportionate to the size of a proposed development' should be amended to specify scale of development.
69. Paragraph 7.7.4 on the approach to traditional buildings is welcomed as is the reference to the STBA and Historic England's guidance on Planning Responsible Retrofit of Traditional Buildings. This paragraph could also usefully point to the guidance contained on the Greater Cambridge Shared Planning Service's website in relation to making historic homes more energy efficient: [Making historic homes more energy efficient \(greatercambridgeplanning.org\)](https://www.greatercambridgeplanning.org/making-historic-homes-more-energy-efficient).

Policy SNNP10 Responding to Climate Change and the Risk of Local Flooding

70. The content of Policy SNNP10 is already covered in Local Plan Policy 32: Flood risk. It is unclear what the Neighbourhood Plan policy adds. This was also highlighted in comments provided on the Plan in November 2022.
71. Policy SNNP10 states that 'All development proposals...should be accompanied by a site-specific flood risk assessment'. The policy needs to be clear the scale of development that needs a specific flood risk assessment and whether extensions are included.
72. When referring to the 'most up to date Strategic Flood Risk Assessment Report' it is recommended that the full title is included to assist users in finding the referred to document.

73. The policy states 'for all developments in all locations, SuDS are the preferred method'. It is suggested that wording is amended to reflect small scale developments or extensions.
74. When referring to 'new roofs', the wording should be amended to read 'new flat roofs' to allow for opportunities to install green, brown, or biodiverse roofs.

Policy SNNP11 Protecting and Enhancing Local Character Through Design-led Development

75. In the first line of Policy SNNP11 it states 'all development proposals'. It is therefore not necessary to identify what 'all' refers to in the brackets that follow.
76. In SNNP11, part c) that states 'Proposed building form and massing should respond appropriately to neighbourhood buildings', clarity is required.
77. SNNP11, part d), that states 'Where flat roofs are considered acceptable, these should be green or brown roofs.' This is already a requirement of Policy 31 of the Local Plan and therefore does not need to be repeated.
78. In SNNP11, e), f), and g), the prescription on building materials is not supported as there are good examples of divergent materiality which complement their context in a positive way. It is suggested that wording is amended to consider that materials should be judged on a case-by-case basis using context drivers and other design-led methods.
79. SNNP11, parts e) and f) could also be combined to describe how materials 'should be drawn from the prevailing materials palette'. It is suggested that removing 'or other brick dressing' will reduce ambiguity of the policy.
80. SNNP11, part g), could describe the role that chimneys have in articulating the roofscape.
81. SNNP11, part h) does not necessarily comply with sustainability goals and should only apply to listed buildings or to comply with Heritage policies rather than all structures. Equally some porches, doors may need to be enlarged to accommodate aging populations and wheelchair and other disabled users.
82. In SNNP11, part h), is the use of the word 'retain' inappropriate? Wording could be amended to read 'Proposals should draw on design features typical of the area including sash, casement windows [...]'.

83. Could a new part i) be introduced to talk about retention, reinstatement and repair of original design features? This would help clarify the approach needed for new development vs. change to existing buildings.
84. In SNNP11, should reference be made to 'clay tiles' to remove the possible use of concrete large format tiles?

Policy SNNP12 Protecting Residential Amenity in South Newnham

85. The majority of the content of Policy SNNP12 is already covered in the adopted Local Plan so therefore does not need to be repeated.
86. The opening sentence of the policy states, "all development proposals" and so it is not necessary to identify what it refers to in brackets.
87. SNNP12, part a), states 'unacceptable overlooking'. What is the definition of acceptable in terms of assessment? This may be difficult to enforce. The wording is also unclear '(loss or privacy an immediate outlook)'. Should this be 'loss of privacy or an immediate outlook'?
88. To align with Policy 58 of the adopted Local Plan, it is suggested that overbearing impacts (visually dominated) is included in SNNP12, part a). It is also suggested that reference to 'glass directly facing neighbours properties' is removed. If there is planning harm either through visual impact or residential amenity then this may be reasonable, but if there is no planning harm it seems difficult to restrict and implement this part of the policy.
89. SNNP12, the penultimate paragraph starting 'with respect to a)', it is suggested amending wording to read: 'report should be commissioned in accordance with BRE Guidance, including Right to Light Studies or Shadow Studies'.
90. In paragraph 7.7.13, it is suggested to check that this policy covers all pollutants in accordance with Local Plan policies and re-word this policy to be clearer.

Policy SNNP13 Converting Existing Houses into more than one Separate Housing Unit

91. It is not clear whether Policy SNNP13 is referring to the creation of houses in multiple occupation or the physical conversion of a dwelling into smaller dwellings. Planning consent is only required for houses in multiple occupation where a shared dwelling house is occupied by more than six unrelated individuals who share basic amenities such as a kitchen or bathroom.

92. The wording 'to meet evolving family needs' should be removed. It is very specific and could cause some difficulty in interpretation. For example: it is not clear how 'family' would be defined, and it would be difficult to determine whether the subdivision was to support family needs. It also does not allow for an owner, regardless of family circumstances, to sub-divide the property e.g., a single owner or landlord, or someone who wanted to sell one or both properties separately.
93. Within SNNP13 it is recommended that functional design is considered. Proposals need to provide bin and bike storage, and not impact on local streets by creating additional car parking.

Policy SNNP14 Protecting the Character of Neighbourhood Garden Boundaries

94. SNNP14 seeks the retention of existing boundary treatments, whereas new boundary treatments should be consistent with adjacent building lines and detailing. The wording would mean that a site/neighbouring site has poor boundary treatments (wire fencing) and sought to change to a soft boundary treatment (hedgerow), this would not be possible. It is recommended that the wording is amending to reflect the need for 'appropriate boundary treatments which show consideration of existing boundary treatments, adjacent building lines and detailing' (rather than requiring them to be consistent with existing boundary treatments on site or at neighbouring properties).
95. The policy is ambiguous with regards to retention of front gardens. Does this prevent the use of front gardens or driveways?
96. Map 7 shows the boundary of the South Newnham Neighbourhood Area, the Newnham Conservation Area and West Cambridge Conservation Area. Rather than having arrows pointing to the boundaries, the different areas could be shown in a legend with the colours/outlines listed.

Policy SNNP15 Conserving and Enhancing Existing Views and Street Scenes

97. The expectation in SNNP15 to recognise, maintain and where possible enhance streetscape/landscape character is supported, however it is not considered significantly different to the related policies in the Local Plan. These existing policies provide protection to these spaces through designations such as Protected Open Space and Greenbelt. A 'right to a view' is not something we can guarantee in the future, therefore it is suggested to amend the wording of the policy.

98. The policy should also refer to the “key features” of the important views and which should be identified in the supporting evidence.
99. Within SNNP15, it is not clear what the meaning of ‘communal views’ is. The views are identified to provide additional protection/safeguarding to existing open spaces. Many are backed by established boundaries either in the form of trees/wooded boundaries or established built edges. Those views to the south towards Grantchester Meadows are protected by virtue of the designations already in place on these areas.
100. SNNP15 states ‘views of established street trees and gardens’. The removal of trees may be necessary and on the other hand alteration of ‘communal views’ may be necessary. It is suggested to amend the policy to include wording along the lines of: ‘established views may require alteration if schemes provide a significant level of public benefit’. This is worded similarly in Green Belt considerations whilst seeking to enhance character through quality design, but may not necessarily enhance the selected ‘communal views’.
101. It is recommended that wording in the last statement of SNNP15 that starts: ‘careful consideration should’, is amended to ensure compliance with Policy 57 of the Local Plan, and should read: ‘Careful consideration should be given to the storage of bins and bikes to minimise their impact on the street scene, *whilst ensuring cycle storage is as accessible as car parking and that bin storage in appropriately located in close proximity to collection points as far as practicable.*’

Implementing and Monitoring

102. Paragraph 8.0 on the implementation and monitoring provides an opportunity to summarise the purpose of the Neighbourhood Plan its vision, policies, and community actions. It will be useful to consider expanding the explanation of how the monitoring of the Neighbourhood Plan will be set up to monitor the impacts of the Plans policies and the progress of community actions.
103. It would also be useful to reference the timeframe of the Neighbourhood Plan for example by explaining that the Plan will be implemented during the period of 2023-2041, explaining how it relates to the emerging policies in the Greater Cambridge Local Plan.
104. The Plan should also consider if it would be reviewed to take into account possible changes in national and local planning policy. This could include a

reference to a formal review process undertaken after five years of adoption to ensure that the Plan is still current and could reflect changes to ensure implementation of the policies in determining planning applications.

General comments on the pre-submission draft plan

105. The comments below are advisory to help improve certain elements of the Neighbourhood Plan, but they are not related to whether the Plan passes the Basic Conditions test. It is therefore at the discretion of the Neighbourhood Forum to decide whether to implement them or not.

Plan period

106. It is noted that the Neighbourhood Plan period is up to 2041. The Councils are preparing a Greater Cambridge Local Plan to the same time frame (2041) but this process is not expected to conclude until after your Neighbourhood Plan has been adopted. This may result in future differences between the Neighbourhood Plan and the emerging Plan as they are being prepared (and changes arising from the national planning reforms which may shape the Greater Cambridge Local Plan). We will nevertheless seek to minimise any potential policy conflicts through that process, but it is important to be aware of the possibility of such conflict at this stage.

Developer Contributions

107. It is suggested that the Neighbourhood Plan may benefit from including either a reference to or a policy on developer contributions. This would be to enable the mitigation of potential impacts of new development.
108. In Policy 85, the Local Plan sets out how Section 106 and Community Infrastructure Levy (CIL) could be used to pay for infrastructure on new developments. Cambridge City Council has yet to propose, set, charge, or collect CIL so far. In addition to this, the national government is proposing an Infrastructure Levy which could potentially replace CIL and possibly S106.
109. Potentially if a CIL were to be adopted, some of the funds from new development could be passed by the City Council to Neighbourhood Forums for identified spending on infrastructure.
110. Section 106 planning obligations can only be sought where they are 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 (the CIL tests).

111. Where new development occurs, through the preparation of the Neighbourhood Plan, the City Council in conjunction with the community and other stakeholders, potentially could identify a number of priority infrastructure projects to secure funding (either in whole or in part) through the use of planning obligations (subject to the CIL tests).

The Neighbourhood Area

112. Paragraph 3.4 could be expanded to provide an understanding of affordable housing provision that is currently provided in the South Newnham area. This would be 2% of the 1084 dwellings in the neighbourhood area or 22 dwellings.
113. Paragraph 3.5 could be expanded to provide a demographic breakdown rather than just household size. This would provide a better understanding of what the community needs in terms of amenities and services.

Vision Statement

114. It is noted that the Plan has kept in paragraph 5.1 describing the process of how the vision was reached. Our advice from previous comments on the Plan in November 2022 remains the same.
115. How much does Figure 8: Vision Flow Diagram add to the understanding of the vision of the Plan and of the policies? It was also suggested that this was removed in comments from November 2022.

Accessibility guidance

116. The Plan will need to meet document accessibility guidelines. In particular, the use of all capitals on the maps is not generally easy to read for some users.

Grammar and typographic matters

117. We recommend that a thorough review of the draft Plan is undertaken of formatting, punctuation, and appearance for a consistent approach.
118. When referring to the 'Local Planning Authority', sometimes the words are capitalised and other times is not. We recommend being consistent with your chosen approach to wording.

119. It is recommended to amend the font type for text in SNCA6 to be consistent with the rest of the font styles in SNCA1-A5.
120. Paragraph 7.7.20 has a spelling error in the title 'vVews', this should be amended to 'Views'.