

Appendix 1

South Cambridgeshire District Council's response to the consultation on the submission Histon & Impington Neighbourhood Plan

1. South Cambridge District Council (SCDC) is taking the opportunity to provide the examiner of the Histon & Impington Neighbourhood Plan with the local planning authority's comments on the submission version of the plan.
2. SCDC has worked with Histon & Impington Parish Council (PC) as they have been preparing their plan. There have been a number of 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 is supportive of the aims of the Histon & Impington 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 Histon & Impington PC in reaching this stage of submitting their Plan to us for examination.
4. The comments we have made on the Plan are provided in two sections
 - A. General overarching comments about particular issues that relate to the Plan as a whole
 - B. Comments which highlight particular/key issues with policies where it might be helpful if the plan were amended.

A - General overarching comments

Policies Map and Tables

5. Although it is acknowledged that a single Policies Map is not a requirement for a Neighbourhood Plan, SCDC considers that, for complex Plans like Histon & Impington, such a map helps in providing clarity to those policies that include site allocations and site-specific issues. The Plan would be easier to read and understand if a comprehensive Policies Map were included for the whole of the Plan Area with a more detailed "inset" or "insets" for the central areas where there are a number of policy designations. For example, the map 13 on page 80 (Vision Park) has a number of "interesting buildings" adjoining the policy site. Having them identified on the same map will help the users of the Plan understand the potential constraints on future development proposals on the Vision Park.
6. It would be helpful for the future users of the Plan if there was a comprehensive Policies Map. These users are unlikely to have a detailed knowledge of the villages and particular sites mentioned in the Plan. It would help to tell the story of the Plan and provide an overview of what is proposed in the Plan.
7. The NPIERS guidance¹ on examinations also mentions the importance of mapping in a neighbourhood plan. It sets out that the qualifying body should check the following prior to submitting a Plan to the local planning authority (Page 29):

¹ NPIERS Guidance to service users and examiners - <https://www.rics.org/globalassets/rics-website/media/upholding-professional-standards/regulation/drs/drs-services/npiers-planning-guidance-to-service-users-and-examiners-rics.pdf>

1.7.2. *Plans should be supported by clear mapping, including:*

- *Accurate delineation of the boundaries of the plan*
- *The boundaries of any site allocations, and designations made in the plan (preferably including street names).*

8. Within the Plan in paragraph 1.21 there are caveats included about the accuracy of all the maps included in the document. The boundaries shown on all the maps must be clear as they will be used to identify site specific policies and allocations. It is not appropriate to include these caveats on the accuracy of these maps as they will have legal standing once the Plan is made and part of the development plan for South Cambridgeshire.
9. In particular, we feel it would be helpful if site specific designations in the following policies were illustrated on a Proposals Map:
- a) Policy HIM02 Interesting buildings (Non- designated heritage assets)?
 - b) Policy HIM04 The Windmill
 - c) Policy HIM06 Commercial Core
 - d) Policy HIM07 The School Hill Site
 - e) Policy HIM08 The Jam Factory
 - f) Policy HIM09 Vision Park
 - g) Policy Him10 Bypass Farm
 - h) Policy HIM11 School Hill Garden
 - i) Policy HIM12 Local Green Space
 - j) Policy HIM13 Important Natural Habitats
 - k) Policy HIM14 Maximising Recreational Space
 - l) Policy HIM15 Walking and Cycling Routes?
 - m) Policy HIM16 A14 Mitigation Sites
 - n) Policy HIM17 The Infant School Site
 - o) Policy HIN19 Station site
10. SCDC has concerns about some maps included in the Plan. As follows:
- Map 7- shows walkable neighbourhoods but fails to identify the commercial centres which are the foci.
 - Map 8 – is not detailed enough to be able to identify each of the designated interesting buildings. Although the buildings have been annotated on this map it is still not clear where each building is and its curtilage – in the evidence documents relating to interesting buildings there are no more detailed maps to identify the property boundary and its significance.
 - Map 9- For clarity, map 9 should clearly show the distances referenced in the policy and the supporting text (i.e. 75m, 100m and 400m), so applicants can clearly see what zone their proposal falls into.
 - Map 12 - It is indicated in the paragraph that the green separation is identified as 'F' on Map 12. It is presumed that the green separation is an area. By representing this on the map as a distinct point it is not clear what the extent of the area is.
 - Map 12 - It would be beneficial to illustrate in broad terms on this map where the greenways, green separation and proposed housing could be located. This would help clarify the requirements of the policy. Also for those that do not know the parish which direction the High Street is and the Community Orchard, Manor Field as these are mentioned in the policy.

- Map 14 – It would have helped the understanding of the policy if this map had indicated, in broad terms, where a sports hall could be located and the car parking. It could also have illustrated where a safe cycle link could be from the village. This would enhance the policy and provide certainty for local residents that might be impacted by such proposals.
- Map 16 - There needs to be an explanation in the key to the map that the numbers on the map reference each Local Green Space
- Map 17 - Whilst supporting the aim of this map to show the ecological connectivity and the network that exists throughout the neighbourhood area there may have been value by making it clear on this map that the LGS and PVAA designations are shown as other non-important natural habitat areas. As shown, it confuses the reader as to what these areas are and that not all these areas are included – Even a school playing field as a green space would provide connectivity between other more biodiversity rich areas.
- Map 20 & 21 - By having two maps identifying different routes around and within the villages there is not a clear idea of what is proposed. Would one map have been a simpler solution? The Plan indicates that the 'aspirational' routes are not prescriptive but by being shown on an OS map following particular routes they imply a firmer designation. An arrow pointing in the direction of where a route may be desired could have been a better way of showing the future objectives.
- Map 22 - In identifying these sites on a map and providing boundary lines adjacent to the A14 there needs to be care that this does not impact within the red line of the current A14 improvement scheme. It is not clear that the parish council has consulted Highways England as part of the pre-submission consultation concerning these boundaries.

11. The maps and tables throughout the Plan are clearly labelled with cross referencing to policies – this is to be welcomed. However, some maps have had additional information added to them to identify buildings or specific areas which are named in the supporting text but have not been included in the key to the relevant map.
- a) Map 11 – A to E showing particular buildings
 - b) Map 12 – F showing green separation

Supporting text / Justification for policies

12. There are a number of instances where criteria included within policies are not explained or justified in the supporting text. It is apparent that a considerable and worthwhile amount of work has been carried out to gather evidence as identified by the number of supporting evidence documents. However, it would help the Plan user if the salient points were summarised within the supporting text for each policy. Inclusion of such information would help to tell the story more clearly of why policies are included in the Plan and the reason for particular criteria requirements.

Village Design Guide Supplementary Planning Document (VDG SPD)

13. The preparation of the draft VDG has run in parallel with development of the Histon & Impington Neighbourhood Plan. This has been recognised within the Plan (paragraph 1.18 – 1.20). The VDG is a Supplementary Planning Document developed as design-focused tool to guide all new development in the villages supporting design policies in the Local Plan. The consultation on the draft is running parallel with that of the Submission Neighbourhood Plan. The VDG will be adopted by SCDC following consideration of any representations received during the consultation. There are a number of specific sites with policies in the Plan where design guidance is included in

the draft SPD. It would be beneficial if for these site-specific policies mention was made that design guidance in the draft SPD should be taken into account.

- a) Policy HIM06 Commercial Core
- b) Policy HIM07 The School Hill Site
- c) Policy HIM19 Station Site

The Vision

14. Reference is made in the vision statement to the “population... approaching 10,000”. The 2011 population of the villages was 8,700 which suggests quite significant amount of growth over that period. Is that what is desired/deliverable in the villages given that there are no allocations for housing in the Neighbourhood Plan? SCDC has suggested that this wording be removed to avoid confusion.

The Policy section and Paragraph numbering

15. Section 5 remains a very long chapter which has grown from the pre-submission version of around 75 pages to 110 pages in the submission. The paragraph numbering now goes up to 5.258. This is very long, and it would help the reader and usability of the Plan if there were separate chapters for the policies under each of the seven Priority Areas.
16. The following section sets out SCDC’s comments for each policy highlighting only the key issues where it may be helpful to amend the wording of the policy for clarity of meaning.

Chapter 5 – Policies Priority: Essential Character

17. Policy HIM01 High Quality Design – Residential Development
 - a) SCDC supports the aim of this policy to embed within a policy the guidance provided in the Histon & Impington Village Design Guide Supplementary Planning Document (VDG SPD).
 - b) It would have been helpful if this policy had applied to other new buildings that could have the potential for significantly greater impact than a dwelling. For example, new commercial units in or on the edge of the village centre would not be covered by this policy in the Plan. SCDC had suggested that in reviewing the policy it could have included other forms of development.
 - c) It may have helped the reader of the Plan if more information about the Village Design Guide had been included in the supporting text to this policy.
 - d) SCDC would question why some of the policies relating to parking and layout are not also applicable to 2-10 units? Should there be more generic for all, than size specific?
 - e) There are some terms that may need further explanation that may be explained in the VDG? e.g. What is a ‘Building for Life assessment’ or an ‘active façade’. What is meant by designing in safe outdoor play in playgrounds? ‘Building for Life’ is now called ‘Building for Life 12’ and it would be expected that the checklist would either be linked from the Plan or included as an Appendix? <http://www.builtforlifelifehomes.org/go/building-for-life-12>. The term ‘active frontages’ is the term used by SCDC urban design team – is this the same as an active façade? These terms need to be defined clearly to be implementable.
 - f) Bullet point 2 refers to ‘poor quality or little architectural interest’. This could be ambiguous and open to interpretation.

- g) For ease of use SCDC would find it more helpful if the policy wording was ordered in development size, extensions and single units, 2-9 units and over 10.

18. Policy HIM02 Interesting buildings (Non-designated heritage assets)

- a) SCDC supports this policy and would suggest that the title of it be amended to align naming with a future aspiration that SCDC has to compile a local list for the district – suggested additional words – ‘Non-designated heritage assets of local interest’.
- b) SCDC has some concerns at the selection process for identifying interesting buildings. The criteria for selection is set out in the supporting text and whilst it is referenced as being consistent with Section 7 of Historic England’s Guidance Note; the criteria is overly simplified and in SCDC’s opinion would not be sufficient to withstand scrutiny, were it to be used as a sole evidence base for designating a building as a non-designated heritage asset in the decision making process. SCDC Local Heritage List would use the Historic England guidance.

It is explained that the list has been developed by the Village Society, but it is unclear what qualifications they have to make such judgements which could lead to challenge and difficulty in giving weight to the policy. Whilst details of the process for selecting and ratifying new entries, including details of the panel are provided, it would be beneficial to have further information regarding the nomination/ assessment process, as this is not sufficiently explained at present.

For the ‘list’ to have sufficient weight to be viewed in the planning process, SCDC consider that the terminology, criteria and selection process should more closely align with existing guidance published by Historic England. This should be clearly set out in the supporting text to the policy. This could then align with a future SCDC Local Heritage List.

- c) Whilst the current identified buildings are annotated on Map 8 it is not clearly stated what the mechanism will be to ensure that users of the Plan will be using the most up-to-date list, what the democratic process will be for approving that list and the mechanism for consulting on amendments/ additions. SCDC suggest that any amendments to this list of identified buildings as a result of the annual review should be part of a review of the Plan. This would then allow an opportunity for consulting on the list and certainty that it is part of the Plan.
- d) In the third sentence mention is made of the SCDC Planning Portal – this term is not used by SCDC to describe its website relating to planning matters. It is suggested that the link be made to the Histon & Impington Neighbourhood Plan webpage to host this list alongside the neighbourhood plan?
- e) Would suggest that the fourth sentence should reflect commonly used terms for the consideration of impact on heritage assets, such as: ‘Proposals for any works that would lead to harm or substantial harm to a non-designated heritage asset should be supported by detailed analysis of the asset that demonstrates the wider public benefit of the proposal.
- f) Buildings which are considered curtilage listed do not need to be included in the list and should be removed. The ‘Old Church School façade’ entry should be amended to include the whole building; however, the

description should specify that the north façade is the reason for interest in this building.

19. Policy HIM03 Size, Scale and Location of New Housing

- a) Outside of the development framework in this area is Green Belt and apart from exception sites until the review of the local plan there is unlikely to be development proposed in this area and therefore the second paragraph in this policy is not required as it would seem to be supporting other development in the Green Belt.
- b) The third paragraph of the policy concerning the level of infrastructure is repeating the requirements of a Local Plan policy – Policy SC/4: Meeting Community Needs. This policy sets out the services and facilities required for new development within the district.
- c) It will be for the review of the next local plan for the area to consider whether there should be any changes to the Cambridge Green Belt which could allow for development in the Plan area. This local plan is to be a joint plan with Cambridge City. This Plan does not need to consider whether developments may take place in the future within what is now Green Belt and by indicating a maximum size of 50 units it could be seen to be supporting any development coming forward at a future date up to this scale of development which may not be the intention of the parish council within their Plan. The fourth paragraph in this policy could be deleted. SCDC would suggest that the figure should also be removed from the supporting text as this may create a higher target for developers to aspire to within the villages.
- d) Due to changes in national guidance following the examination the Local Plan policy on affordable housing was amended in the adoption version to say sites of 11 units or higher is expected to deliver 40% affordable housing. The supporting text to this policy still retains 'over 10' which means that it is no longer conforming with the Local Plan policy.

20. Policy HIM04 The Windmill

- a) SCDC welcomes the policy to preserve the future of the windmill. The policy states that it will be the Molen Biotoop method that is to be used to assess the impact of future development on the wind flow in the area. SCDC is not aware of alternative methods to do such an assessment however considers that if an alternative means of measuring subsequently proves to be more useful the policy is committed to one method to be successful. E.g. mentioning Molen Biotoop method in the policy. SCDC considers that the policy would benefit if rather than stating an actual type that it states that a recognised method will be used.
- b) An issue for SCDC, as the local planning authority, will be how to implement this policy. Who will be advising planners (and potentially applicants) on the application of the Molen Biotoop method and are there the skills, experience and resources to do this? The Neighbourhood Plan suggests that implementation of the policy would be overseen by Conservation officers –are they familiar with application of the Molen Biotoop methodology? If SCDC has not got sufficient skills in house, then the question is for each application that needs an assessment carried out, will we need to engage with an independent advisor to verify the reports?

21. Policy HIM05 Parking Provision for cars and cycles

- a) It would have assisted the understanding of this policy if the definition of what a “restricted street” that is included at the bottom of Table 2 were to appear earlier in this section within the supporting text to the policy. Currently this explanation is in the Plan after the policy and therefore does not make for easy reading. There does not appear to be a dimension included to explain what constitutes ‘narrow’ for the definition of a restrict street.
- b) There is a conflict of interest with encouraging more parking in the commercial core (Policy HIM06) and this policy which is restricting it; there is a finite amount of land available.
- c) It would be beneficial to show these restricted streets on a map for those that do not have a local knowledge of the villages.
- d) The Plan refers to Figure 11 having the indicative parking standards in the Local Plan – it is Figure 12 in the Local Plan.
- e) SCDC has ongoing concerns about this policy which includes a requirement for all new development (including change of use) to provide parking within their curtilage albeit that there is recognition that this may not always be appropriate. This is placing severe restrictions on the ability for new commercial business uses (including retail) to be able to operate in the commercial core. Such a requirement could have an impact on other objectives e.g. design, heritage. More car parking will impact on the character and layout of places. This could result in unintended consequences with frontages dominated by parking particularly where terraces are proposed. This also precludes shared unallocated parking areas to provide a more efficient parking solution. A design led approach as advocated in the Local Plan could be adopted. This policy will push parking into the street in front of dwellings therefore created a car dominated space. The policy should state where parking can be achieved or point to the Village Design Guide SPD, District Design Guide 2010 or similar guidance (Manual for Streets) as well as where it shouldn't be placed i.e. to the side of structures, within structures as appropriate to the site.
- f) The policy's consideration of garage dimensions could be confusing as it sets a particular size for driveway and type of door - it may have been simpler to say that the driveway is suitable for a standard vehicle to park on rather than stating it should be 5m long. 4x4 cars are often longer 5.5m.
- g) The dimensions for a garage included in this Plan are smaller than that included in the Local Plan Policy TI/3. Would this allow sufficient space for the wider shape of new cars? The District Design Guide refers to garages in Chapter 6 – the adequate size being a minimum of 3.3 x 6.0m with additional allowance of 1.0m at the end or 650-750cm at the side to allow for cycles. (<https://www.scambs.gov.uk/media/6683/adopted-design-guide-spd-final-chapters-4-5-6.pdf>) the Cambridge Local Plan page 427(<https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf>) sets out dimensions for useable garages including circulation space; the dimensions given in this Plan are too small.
- h) For parking spaces how would it be determined whether the space was for a car or van?
- i) Publicly accessible charging points for electric vehicles will only be provided to meet demand but there could be latent demand for such facilities.
- j) In the cycle parking section, the Sheffield or Rounded A stand is specifically mentioned which by putting within a policy could be inflexible if

other alternative stands are appropriate at a future date. Other more bespoke solutions may be more in keeping with the context.

- k) The fourth bullet point in the cycle section states that cycle parking should be 'Covered, fit for purpose and attractive'. This could be ambiguous as it does not state that such facilities should be designed to fit into the character of their local area.
- l) SCDC has not had sight of the evidence base for the additional cycle provision for different activities and classes as provided in table 3? SCDC is concerned about the implications of land requirements which may have detrimental effects to the overall design. Large areas of cycle parking need careful consideration.

Chapter 5 Policy Priority: Successful Economy

22. Policy HIM06 Commercial Core

- a) The second bullet point mentions the glossary to the NPPF for main town centre uses. SCDC consider that it would be helpful to include these uses in the supporting text to the policy / in the policy.
- b) The second sentence of this policy mentions the Plan supporting proposals that 'diversity and enhance' the range of shops etc. SCDC thinks that these terms are very open and could catch everything which may not be the intension of the parish council.
- c) SCDC consider that the fourth and fifth bullet points are outside the scope of a neighbourhood plan so should be deleted. There is very limited land available to achieve this.
- d) This policy could have made reference to the impact of signage and advertising which can make a significant impact upon the character of the locality and street scene. A criterion could have been added to consider a high standard of quality and design within the commercial core.
- e) This policy appears to be driven by increasing parking provision which would be detrimental to the street scene rather than creating a good public realm which is a space that is people friendly as advocated by a walkable neighbourhood; well landscaped and defined areas for pedestrians and cyclists, including opportunities to enhance the street scene with trees.
- f) The draft Village Design Guidance SPD considers this whole area. It would strengthen the policy and provide wider consideration for the future public realm within the core area if reference was made to the VDG – '...that the policy be informed by the design guidance included in the Histon & Impington Village Design Guide SPD and any documents which supersede this.

23. Policy HIM07 The School Hill Site

- a) It would be helpful if the town centre uses referred to in the first bullet point in the policy were included in the supporting text to the policy and within the policy wording to assist the user of the Plan to fully understand the policy.
- b) It is not usual to use a term such as 'thoughtful' public realm strategy plan. The supporting paragraphs refer to requiring a "high quality" public realm. Consideration should be given as to whether the requirement is used in the policy.
- c) This policy would have benefited from having design criteria included in it. Such criteria could have set out how the area would be enhanced by the development of this site and how it would fit into the High Street / character of the local area.

- d) It should be noted that there is a current planning application on this site – S/1793/19/FL being considered by SCDC.
- e) The draft Village Design Guidance SPD considers this site. It would strengthen the policy if reference was made to the VDG – ‘...that the policy be informed by the design guidance included in the Histon & Impington Village Design Guide SPD and any documents which supersede this.

24. Policy HIM08 The Jam Factory

- a) There is an arrow on Map 12 which states ‘High Street’. This is presumably indicating that “improve direct and safe access” to the High Street is via Home Close which is bullet point one of the policy. There is no key to explain this on the map. The road already has pavements either side and it is therefore not clear what improvements could be achieved as a result of the development of this site as a result of this policy.
- b) It is not apparent from the wording in the policy how “small-scale” residential development could be accommodated on this site. The opening line of the policy seeks to maintain or increase the level of employment. It also seeks to retain the open area between the site and Home Close. As such, there would not appear to be any opportunities for acceptable small-scale residential development that would have acceptable amenity given the manufacturing use of the site.
- c) It would help if Map 12 illustrated in broad terms on this map where the greenways, green separation and proposed housing could be located. This would help clarify the requirements of the policy
- d) This area would benefit from a design framework or brief which sets out a spatial design strategy. This would enable community involvement throughout the process, including scoping ideas with the aim of creating a set the design parameters for developers. This would be required as part of the development and planning process.

Chapter 5 Policy Priority - Vibrant Community

25. There are several policies relating to protecting open space within the Plan. SCDC considers that it would have helped the user of the Plan to have one comprehensive map showing all the different designations proposed in the Plan and those included in the Local Plan for the villages. Consideration could have been given to including a Green Infrastructure / Green Corridor strategy with a policy in the Plan to prepare such a scheme. Table 4 does list all the open spaces referenced in the plan, but a list does not show how they may be spatially linked together. This could have helped identify where there are gaps in this network and the importance of green corridors in and around the two villages. Whilst recognising that Map 17 has been added to the Submission version of the Plan it does not include all the green space policies for the villages.

26. Policy HIM10 Bypass Farm

- a) This site is allocated in the new Local Plan. The safeguarding element of the policy is a repeat the policy of the adopted Local Plan and could have been deleted.
- b) There are a number of criteria included in the policy relating to the facility with % figures attached to them – it is not clear how these figures were decided upon and whether they are reasonable. There does not appear to be evidence to support and justify them.
 - i. Building space is no more than 2% of the total –

- ii. Car parking is not more than 4% -
- iii. Cycle provision – 120 spaces
- c) The final criterion looks to provide a safe and direct off-road access, but it is not clear whether this access is achievable.
- d) SCDC consider that it would help the user of the Plan if Map 14 showing the site could indicate, in broad terms, where a sports hall could be located and the car parking. It could also illustrate where a safe cycle link could be from the village. This would enhance the policy and provide certainty for local residents that might be impacted by such proposals.
- e) SCDC consider that a design brief outlining the spatial parameters could help explain the policy.

27. Policy HIM11 School Hill Garden

- a) SCDC welcomes this policy but suggests it could be more clearly worded if the following wording had been used ... 'In accordance with Policy NH/11 in the adopted Local Plan this site is designated as a PVAA'
- b) It may have been simpler if Map 15 had showed only the new PVAA rather than all those within the villages.

28. Policy HIM12 Local Green Space

- a) SCDC welcomes this policy but suggests it could be more clearly worded if the following wording had been used..... 'In accordance with Policy NH/12 in the adopted Local Plan these sites are designated as LGS' The sites could then be listed within the policy.
- b) Particular sites designated:
 - i. V4 north Buxhall Farm: This site is adjacent to the area that is to be developed for a new primary school. SCDC had asked the parish council to liaise with the County Council to ensure that the requirement for the development of the school had been allowed for in designating this LGS. Once a LGS is included in a made neighbourhood plan it does not allow for flexibility of its boundary and can only be reviewed as part of the review of a neighbourhood plan or local plan. SCDC in designating LGS in the Local Plan had a principle whereby it did not identify school playing fields as this could cause problems in the future if a school wished to expand. Should this have been proposed as a PVAA to allow for flexibility?
 - ii. V14 Infant school field: SCDC has similar concerns regarding designating this as a LGS if it impacts on the future development of the school. Should this have been proposed as a PVAA to allow for flexibility?
 - iii. V33 Cawcutt's Lake and adjacent land: It is unclear from the description given in Table 4 the boundaries of this site. It would appear to have a number of separate areas which are not contiguous. Map 16 needs to clearly show a precise boundary line for this LGS. As shown currently it would appear that this site comprises of a number of parcels of land. Do they all have the same character? Would this LGS benefit from being considered as more than one area and would all meet the tests for LGS? SCDC has concerns that the boundaries of these areas may overlap with the red line boundary of the DCO for the A14 upgrading scheme being carried out by Highways England. Once within a made neighbourhood plan a LGS designation would have an impact on any future development works alongside the A14.

29. Policy HIM13 Important Natural Habitats

- a) Table 6 sets out a schedule of all the important natural habitats. SCDC welcomes the evidence of this detailed assessment but considers that it would be better placed in an evidence document rather than within the Plan.
- b) Particular sites designated:
 - i. V33 Calcutt's Lake and adjacent land: It is not clear why it has been necessary to include this area within the protection of this policy as it already is within the Green Belt and is proposed as LGS.
 - ii. V33 & V34: SCDC has concerns that it is not clear on Map 18 which parcels of land belong to which of these two sites. It would appear that some parts of the sites are within the red line boundary of the DCO of the A14 upgrading scheme. Although this is stated in Table 4 for V34ii) SCDC is confused by the boundaries. Map 18 needs to have clear boundary lines so there is no doubt to the user of the Plan as to the exact extent of each site. Having separate parcels of land is very confusing.

30. Policy HIM14 Maximising Recreational Space

- a) SCDC considers that the management initiative set out in the second paragraph of this policy is beyond the scope of policy planning and could be deleted;
- b) It is not clear how a green linkage will be established as there is no explanation in the supporting text to the policy. It would help the user of the Plan if it were to be illustrated on Map 19.
- c) The policy does not need to include the final section as the Local Plan has policies to consider this (Policy SC/8: Protection of Existing Recreation Areas, Playing Fields, Allotments and Community Orchards and Policy NH/8: Mitigating the impact of development in and adjoining the Green Belt). If this section is retained SCDC suggests that it be reworded. ' .. schemes that encroach on the playing field will be assessed in respect of the level of harm to the playing field'.

Chapter 5 Policy Priority -Getting Around

31. Policy HIM15 Walking and Cycling Routes

- a) Whilst the policy is entitled walking and cycling routes it would appear from table 7 and Maps 20 & 21 that these concentrate on existing walking routes and bridleways for horse riders or are some cycle paths? It would need local knowledge to understand the linkages. Are the cycle paths along main highways? Given that safer cycling links was a top answer in the parish's Big Community Survey it is not clear from the policy and supporting text how this Plan makes a difference.
- b) The draft Village Design Guide SPD has highlighted the importance of connecting the villages with the countryside – the policy could include mention of the VDG and its guidance.
- c) A map showing desire lines (direct linkages) might assist, when considering this that explains where people want to travel and which routes need linking. Maps at different scales (within and outside the village) showing existing cycle and footpath routes (including along highways) with annotations explaining key centres where people want to go may assist this process i.e. direct routes to the city centre/ shopping/ health provision/ employment and education centres. This would help show where linkages could be made.

Chapter 5 Policy Priority - Safe, Secure and Successful

32. Policy HIM16 A14 mitigation sites

- a) Some of the sites listed in green infrastructure in the policy are already protected as LGS or are within the Green Belt. Much of the land is within the Green Belt and SCDC is unclear what development may come forward within these areas to the south of the parish that would contribute towards environmental enhancement work of the green infrastructure.
- b) There is no recognition in the policy that as part of the major works on the A14 Highways England will be carrying out two for one replanting on land alongside the A14.
- c) Particular sites designated
 - i. See comments made for Policy HIM12 LGS and HIM13INF relating to sites V33 and 34
 - ii. V32 South Cambridge Road Wood and Fields: Part of this site appears to be within the red boundary line of the DCO for the A14 scheme. It is worth mentioning in the Plan that Highways England is in discussion with the local community for a planting scheme on the eastern part of the site as part of mitigation.

33. Policy HIM17 The Infant School Site

- a) SCDC welcomes that the Plan has considered the future of this building for community use particularly for the provision of health facilities. There is no specific time scale included in the policy wording if the health facility does not come forward other than stating '*...If during the Plan period it becomes evident..*' SCDC considers that it would reduce the risk of the building remaining empty if a time scale is set for safeguarding of say 10 years to allow for the preferred use to be achieved. It would then allow for other uses as set out in the policy to come forward after this time.
- b) The current criteria in the policy are exclusively related to transport needs and it is a missed opportunity to not have mentioned design criteria. How would any redevelopment of the site impact on the character of the local area? Would the parish council wish to retain all of the existing buildings as it has been identified as an 'Interesting Building (site 26)? This fact is mentioned in paragraph 5.123 but not how this may impact on the future development of the site. This policy could mention the Village Design Guide to provide guidance for the design of development in this site.
- c) Alternatively, this area would benefit from a design framework or brief which sets out a spatial design strategy. This would enable community involvement throughout the process, including scoping ideas with the aim of creating a set the design parameters for developers. This would be required as part of the development and planning process.

Chapter 5 Policy Priority – Housing for all

34. Policy HIM18 Meeting Local Needs – Housing mix

- a) It is not clear whether this policy applies to housing developments of all scales.
- b) It is not clear whether this policy does anything more than the Local Plan Policy H/9 Housing Mix – if it does not it could be deleted.

35. Policy HIM19 Station Site

- a) The first section of this policy can be deleted as it repeats the adopted policy in the Local Plan – Policy E/8 Mixed-use development in Histon & Impington Station area.

- b) Additional requirements have been included in the policy to that of the Local Plan Policy E/8. Bullet 2 indicates a through footpath/cycleway to allow access to Vision Park – was this indicated in the Policy HIM14 and shown on the relevant map? It would help the user of the Plan if this was illustrated on Map 24.
- c) The draft Village Design Guidance SPD considers this site. It would strengthen the policy if reference was made to the VDG – ‘...that the policy be informed by the design guidance included in the Histon & Impington Village Design Guide SPD and any documents which supersede this.
- d) Alternatively, this area would benefit from a design framework or brief which sets out a spatial design strategy. This would enable community involvement throughout the process, including scoping ideas with the aim of creating a set the design parameters for developers. This would be required as part of the development and planning process.