

Subject	Comment or suggestion	Reaction	Response
Executive summary	We are concerned that in Objective 2 'Local Character' on page 8 there is no reference to protecting existing heritage assets and their settings. We assume that this is implied but recommend that it be stated explicitly. We suggest that it would be a good idea to make some reference in this objective to alterations and additions to existing buildings as well as to new buildings.	Agreed	Amended objective 2 to include protection of built heritage and alterations to existing buildings. The justification for GAM3 includes the statement that development in this neighbourhood plan seeks "to enhance and will not harm buildings in the conservation area (see map 2) or other designated heritage assets" (revised paragraph 4.32).
East West Rail	Paragraph 2.12 East West Rail – It is invaluable to include this section in the Plan however the map has a very faint . It will also need a copyright adding to it. (Non-Basic Condition Test)	Agreed	East West Rail have provided a better map in their response. We will include this instead. Copyright has been agreed
Local employment	Paragraph 2.28 Local business – Mention is made of the loss of employment land as a result of Green End having planning permission for housing. There is no clear explanation that this is a housing allocation in the adopted Local Plan. It would help to tell the story of the parish if there was more detail here. It would help to have a map showing where the employment areas are within the parish.	Agreed	Paragraph 2.28 amended to state that this is a housing allocation in the Local Plan. A new map has been commissioned to show employment areas in the parish.
Chart 2	Chart 2 is not clear	Noted	Additional labelling added.
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	Noted	Objective 1 relates directly to policy GAM1 for New Houses and Employment Buildings. The justification for GAM 1, clearly explains the

	the Neighbourhood Plan to promote new development that seeks to 'b. (BC test) ¹		environmental standards we would like to see for new houses and employment buildings.
GAM 1 & GAM2 Housing Growth	As our Local Plan was prepared and adopted before this requirement came into being, we are required if asked by a qualifying body (i.e. the local parish council preparing a Plan) to provide a housing needs figure. We have sent you the methodology we are using to calculate this. We start with the total housing figure for the district and take from this the strategic sites allocated in the Local Plan. This leaves a figure that comprises of the windfall sites. This is then divided according to the percentage of population of South Cambridgeshire living in each parish. Gamlingay has 2.4% of population of South Cambs so % of windfall for Gamlingay is 26. No mention has been made of this figure provided by SCDC. (BC test)	Noted	New paragraph 4.10 explains SCDCs methodology for windfall sites and demonstrate how this quota has been met through granting of planning permission of 26 new homes between 2016 to 2019 (11 of which were self-build) in Dennis Green (5), Great Heath (9), Little Heath (11) and The Cinques (1) ² .

¹ Comments relating to meeting the Basic Conditions test are identified as follows – (BC test) and the other comments as (Non-BC test).

² Gamlingay Parish Council (2019). Appeal reference APP/W0530/W/19/3230103. See appendix 1.
<https://www.dropbox.com/s/4wcf930kx8xpo/Appendix%201%20APP%20W0530%20W%2019%203230103.pdf?dl=0>

<p>GAM 1 & GAM2 Housing Growth, paragraph 4.11</p>	<p>Our main concern with the Plan is the assumption that sites allocated/planning permission already granted will meet all the need identified. There is no breakdown in terms of tenure and property type of the need identified and how this compares to what has already been given planning permission. Therefore, does this truly meet the need identified. The Housing Need Survey does not seem to specify the actual breakdown of need for the 44 households identified, and has taken the approach to reduce this by 50% and then specify property type and tenure based on the provision of an exception site?</p>	<p>Noted</p>	<p>New Table 3 shows how the identified housing need has been met for households in need identified in the BRCC (2018) survey by tenure, type of property and property size for Robinson Court, Green End and West Road.</p>
<p>GAM 1 & GAM2 Housing Growth, paragraph 4.11</p>	<p>The statement that there is not a need for housing exception sites for at least five years (Paragraph 4.11) might be undermined if a new survey were carried out that identified a need. We suggest that the last sentence of paragraph 4.11 should be replaced with 'There is therefore no need to identify further sites for affordable housing to come forward during the next five-year period'. (BC test)</p>	<p>Noted</p>	<p>An additional sentence at the end of the paragraph now states 'The situation will be reviewed every five years'.</p>
<p>GAM 1 & GAM2 Housing Growth</p>	<p>We consider that the Plan appears to contradict itself having stated in paragraph 4.11 that there is no further need to provide affordable housing but then in the At a Glance statement after 4.11 '... What we actually need are more small affordable (to buy and heat) and adaptable homes'. We do not consider that there is enough information to ascertain where the statement (to buy) as opposed to rent comes from. Should your Plan therefore be thinking about supporting a policy for more intermediate tenures, such as shared ownership, rent to buy, etc. If there is</p>	<p>Noted</p>	<p>Former paragraph 4.9 has been amended and now states 'In future, developers are recommended to focus on the community's preference for less expensive, smaller and adaptable 2 to 3 bedroom houses and bungalows'</p>

	evidence your Plan could include a policy about seeking higher standards in terms of accessibility.		
GAM 1 & GAM2 Housing Growth paragraphs 4.13 and 4.14 on Fuel Poverty	<p>With regards to paragraph 4.13 and the reference to local plan policies related to climate change, a useful addition to this would be reference to the Greater Cambridge Sustainable Design and Construction Supplementary Planning Guidance (SPD), which provides further guidance on the implementation of these policies. (Non-BC test)</p> <p>Paragraph 4.14 refers to the Building for Life 12 standard, and while this is a useful measure of design quality, it has very little impact on the environmental performance of homes and the need to address fuel poverty. This paragraph may therefore be better in a section on design quality rather than fuel poverty. (Non-BC test)</p>	Noted	The focus on renewable energy and resource efficiency in the Fuel Poverty section has been strengthened. It references the Greater Cambridge Sustainable Design and Construction SPD, the Cambridgeshire Flood and Water SPD and the Cambridgeshire Sustainable Housing Design Guide. Paragraph 4.14 has been deleted.
GAM1 New Houses and Employment Buildings (policy wording)	This policy is muddled and is not definitive in what it is seeking to achieve. The policy title is 'New Buildings' – or should it be New Dwellings? When the policy states 'more affordable dwellings and bungalows' it is not clear what this is more than? 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.	Agreed	The new policy title specifies 'new houses and employment buildings'; the policy is cross-referenced with GAM5 regarding new employment/industrial buildings on Mill Hill. Reference to affordability has been removed from the policy wording (it is explained in the supporting text). The policy now states that developers are expected to exceed the baseline conditions set out in the local plan. It does not set local standards for insulation, it recommends action developers should take in order to respond to the climate emergency.

GAM1 New Houses and Employment Buildings (policy wording)	Public survey had said people supportive of wind turbine – have you considered allocating a site in the parish? Anywhere suitable? (Non-BC test)	Noted	The parish already has a community wind turbine outside the village. An additional paragraph providing more information about Gamlingay Community Turbine has added to the section on Local Infrastructure. GAM 1 is supportive of on-site renewables such as wind power.
GAM2 Site Allocation at West Road, paragraph 4.20 in relation to West Road	<p>Your group should be allocating this site because the principle of development has been accepted and it safeguards the development should the permission lapse. We had previously suggested the following wording to explain the advantage of having a site allocation in your Plan:</p> <p>“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.”</p>	Agreed	The text has been added to the end of the paragraph.
GAM2 Site Allocation at West Road (Map 8 and policy wording)	<p>The map would need a copyright. (BC test)</p> <p>Wording of the policy needs to be amended to simply allocate the site rather than it being there to meet the housing needs survey which is not the case. The period given 2020-25 we presume is the lifetime of the plan/ the next review? It will meet the housing needs requirement provided by South</p>	Agreed	<p>Map copyright has been obtained.</p> <p>Policy wording has been amended and now reads: “‘The development of a total of 29 dwellings off West Road is allocated in this Plan to meet the housing needs requirement provided by South Cambridgeshire District Council as part of its</p>

	Cambridgeshire as part of its duty set out in paragraph 65 of NPPF. (BC test)		duty set out in paragraph 65 of the National Planning Policy Framework.”
GAM 3 Local Character, Paragraphs 4.24	Main emphasis VDG, just mention VDS 2001. You should emphasis the role of the recently adopted Village Design Guide SPD which provides detailed contextual guidance for new development and is complimentary to the District Design Guide	Agreed	We have expanded justification paragraph to strengthen its legitimacy in planning terms.
GAM 3 Local Character, Paragraphs 4.23 to 4.29 and 4.30	It would help to tell the story of the parish if you included here in the supporting text a summary of the local character areas as set out in the Village Design Guide.	Noted	The main emphasis is on landscape and settlement character.
GAM 3 Local Character, After paragraph 4.29	Provides an opportunity for the identification of ‘non-designated heritage assets’ (NDHA’s). Identifying individual buildings which are felt to be important locally in this way might give extra clarity and specificity to this policy. NDHA is a non-statutory designation, which only carries limited weight, and can only refer to the external form and appearance of the building.	Noted	We have not identified any non-designated heritage assets. However, additional justification has given for the protection of designated heritage assets in line with advice from Historic England.
GAM 3 Local Character paragraph 4.31	A new Settlement Gap policy? Clearly the unique character of your parish is the main village and hamlets. You should include a definition in the supporting text of what you mean by hamlet. Whilst we appreciate that this buffer is already shown on Maps 4 and 7 it would benefit from having an annotated map near the suggested	Noted	The existing policy has been split into two clear sections: general development principles, and, settlement character. We have referred to policy LAW9 of the Babergh Neighbourhood Plan and now refer to a ‘settlement gap’ instead of a ‘buffer’. Maps 4 and 7 will be amended accordingly.

	new policy. Refer to LAW9 Babergh Neighbourhood Plan for wording help.		
GAM3 Local Character paragraph 4.26	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)	Noted	Although the parish survey showed support for self-build, the high cost of land means it is only affordable for a small number of people. between 2016 to 2019, 11 of self-build houses received planning permission in Denis Green, a further 9 nine self-build homes in Heath Road were approved on appeal outside the development framework. The neighbourhood plan gives priority to the communities preference for smaller, less expensive, one or two bedroom dwellings and bungalows.
GAM3 Local Character paragraph 4.27	Paragraph 4.27 mentions recent good examples of new development that respects the character of the village – the Maltings and Stubbs Oak. Could a photograph be added with a site location map or an annotated plan to show what was successful?	Noted	Photographs of the Maltings and Stubbs Oak have been added to the Justification text to illustrate what we mean by good examples of development. Yes
GAM3 Local Character (policy wording)	The first sentence of the policy as drafted needs a word adding after the brackets to make sense – add ‘to’ after development framework) to prevent the village...	Agreed	The word ‘to’ has been added.
GAM3 Local Character (policy wording)	In the second sentence of the first part of the policy mention is made of preserving key views to and from the village. There is no mention of these in the supporting text to the policy. What views are these (e.g. views of something or from somewhere e.g. a public footpath) and what is distinctive about them? They do not appear to be the same views as are	Noted	The supporting text has been updated to include the key views to and from the village. These include the views identified in the Village Design Guide as well as two additional views recommended by the Landscape and Visual Assessment commissioned in response to SCDC

	included in the Village Design Guide SPD. Length of arrows-showing where are views from or to are all the same, is this intentional? Has any assessment work been carried out to identify these views and justify why they have been included in the Plan?		feedback. This will be included in our evidence documents.
GAM3 Local Character (policy wording)	The final sentence of the first part of the policy states that hamlets are not suitable locations for exception sites. We presume that these are housing exception sites. There is no reasoning for this requirement in the supporting text? What tests have been undertaken to establish that the hamlets are suitable or not for exception sites? The Local Plan Policy H/11: Rural Exception Site Affordable Housing states that such sites need to be adjoining a development framework boundary. The hamlets are a little distance from the main village boundary so may not be suitable for exception housing but it would strengthen your policy if you had robust evidence to support your assertion that all the hamlets are unsuitable. (BC test)	Agreed	The supporting text has been updated noting that all new housing should be located within the village framework, and further noting that the hamlets are more than 1300 m from shops and community facilities (as stated in the explanatory text to GAM1 GAM)2. Therefore, they are not suitable locations for housing exception sites.
GAM3 Local Character (policy wording)	The wording in the second part of the policy could be changed to so that it states the policy 'will support development that will follow the guidance included in VDG / or taking account of the principles included in VDG / in line with the principles'.(BC test)	Agreed	Wording has been changed.
GAM3 Local Character (policy wording)	There is no explanation about what is meant by 'suitable landscape treatment' e.g. hedgerows in keeping with Bedfordshire Greensand Ridge NCA – This needs to be set out in the supporting text. (BC test)	Agreed	Supporting text has been amended to explain the importance of trees and hedgerows in particular as suitable landscape treatments. A new map has been creating showing existing hedgerows in the parish.

GAM 4 & GAM5 Local Economy and Employment	It would be helpful to those that do not know the parish well to have an inset map to show the location of the employment sites within the village especially those mentioned in policies.	Agreed	A new map has been added with the location of existing employment sites and policies GAM4 and GAM5.
GAM 4 & GAM5 Local Economy and Employment paragraph 4.38	Paragraph 4.38 mentions Local Plan Policy H/19: Dwellings to support a rural based enterprise indicating that a business may need to have a permanent dwelling which would relate to security. However, there is no mention of this within any policy. Should this be deleted? (Non-BC test)	Agreed	Reference to Local Plan Policy H/19 has been deleted.
GAM4 Local Employment Sites (policy wording)	It should be reworded “applications for ...local employment sites will be supported”	Agreed	GAM4 reworded as suggested.
GAM4 Local Employment Sites (policy wording)	What could be meant by the word ‘local’?	Noted	Policy wording has been expanded to specify ‘within the parish boundary of Gamlingay’.
GAM4 Local Employment Sites (policy wording)	The second section of policy GAM4 states that all applications for new buildings or additional office space must include the provision of electric vehicle charging points. This does not clearly state how many might be required.	Noted	Policy wording now states “All applications for new buildings or additional office space must include provide at least one electric vehicle charging point”
GAM4 Local Employment Sites (policy wording)	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	Noted	GAM4 supports the improvement, enhancement and development of existing employments sites. GAM5 allocates a new employment site at Mill Hill allowing for the expansion of local economic activity.

	difference between these two polices other than GAM5 is allocating a site whereas GAM4 is identifying sites		
GAM4 Local Employment Sites (policy wording)	Station Rd, Church Street, Drove Road and Green End Industrial sites are treated slightly differently in Policy GAM4 Local Employment Sites. We consider that each site should have its own separate policy. These site-specific policies could show what would be supported in the different areas as each has its own character and requirements and constraints. You could include a criterion about what would be considered a suitable scale as well as the use class order. Proposals will need to be suitable in scale to the 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 –A site specific policy could individually highlight what the constraints are for each specific site. Each employment site may have different requirements/ constraints. An inset map could be included to highlight the layout/ issues to be considered for each area and to show the boundary for each area. (BC test)	Noted.	We have chosen not to create site specific policies.
GAM4 Local Employment Sites (policy wording)	Our Economic Development Officer supports the idea of having separate policies for each site. This would not only support appropriate developments but would also help any developer/ business/planner understand the key site issues early on. This would help expedite any application	Noted.	We have chosen not to create site specific policies. GAM4 sets out the key principles for development on all sites.

	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.		
GAM4 Local Employment Sites (policy wording)	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. The listing of Drove Road in GAM4 could be contrary to this strategic policy in the Local Plan if it is not a specific allocation. The Plan should include a map clearly showing the boundaries of this and all the employment sites.	Noted	A new map has been added with the location of existing employment sites and policies GAM4 and GAM5.
GAM4 Local Employment Sites (policy wording)	We are unclear of the extent of the Drove Road employment site, as there is not a map showing this area in the Plan. Earlier versions of the Plan had included a map with boundaries which had been an extensive allocation which also included East Lane and North Lane residential properties. We had expressed concerns at this large allocation for employment. The existing policy had evolved to refer specifically to the expansion of businesses in situ but without a map to indicate where these are located within the area. Are they scattered or concentrated in one area? Are the existing businesses primarily agricultural? If so a general policy that allows agricultural operations to expand and diversify might be more appropriate?	Noted	A new map has been added with the location of existing employment sites and policies GAM4 and GAM5. As stated in paragraph 4.15 there is also light industrial development to the west (E(g)B1 and B2) e.g. Gilks Fencing, RNT Tanks and Silos, and Gemmaton steelworks.

<p>GAM4 Local Employment Sites (policy wording)</p>	<p>We note that Drove Road employment site is now listed in GAM4 rather than GAM5. It is no longer 'allocated as a new employment site' but rather 'identified as a local employment site'. We understand that this is because of residents' concerns and the findings of the Strategic Environment Assessment (SEA). It would be helpful to have this reasoning more fully explained in the supporting text to tell the employment story to the reader of the Plan. (BC test)</p>	<p>Agreed</p>	<p>Additional explanation of the SEA findings has been added to the justification.</p>
<p>GAM4 Local Employment Sites (policy wording)</p>	<p>For Drove Road there are specific criteria that must be followed if a development proposal is to be successful. There is no explanation in the supporting text to justify the support for permitting development that is an increase of 25% of the existing footprint. Why 25%? Given the space available this seems to be quite limiting e.g. would you turn down 30% or even doubling floorspace if it were not detrimental to the surrounding area? 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</p>	<p>Noted.</p>	<p>Additional information provided on the consultation of businesses located on Drove Road, who were asked what percentage expansion would meet their needs.</p> <p>Supporting text (paragraph 4.15 of the consultation document) already includes an explanation of what is deemed an appropriate scale of development, including a photograph illustrating a small single storey, affordable and secure barn style building.</p>

	more straightforward? There could be an explanation of what is considered appropriate scale in the supporting text. (BC test)		
GAM4 Local Employment Sites (policy wording)	We have previously expressed our concerns on the inclusion of the B8 use in the policy wording for both employment policies. Would applications for development of B8 uses be approved on all these employment sites regardless of scale or specific location constraints? Although it has been highlighted to us that such uses already exist on these sites 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 in your Plan would not meet the basic condition test about being in general conformity with the strategic policies in the Local Plan. (BC test)	Noted.	<p>We have removed reference to B8 from GAM4. B8 uses are already present on Mill Hill.</p> <p>Applications for development of B8 uses would not be approved on all these employment sites regardless of scale or specific location constraints. Cumulative impacts will determine how applications can demonstrate:</p> <p>“... that there will be no adverse impact on the rural environment and amenity or property of nearby residents (e.g. unsocial hours of operation, noise impacts, appearance of the development from public roads, damage to buildings and congestion on local roads, due to number, size or weight of vehicles requiring access to the site).</p> <p>All proposals are expected to protect and safeguard landscape features and designations which contribute to visual amenity and local distinctiveness, including trees and hedgerows following the principles set out in the Village Design Guide. Development proposals will incorporate climate change mitigation and adaptation measures (e.g. SuDs) through design.”</p>

GAM5 New Employment Site (policy wording)	<p>Mill Hill is now the only site allocated in GAM5 so this policy could be site specific to Mill Hill. (BC test)</p> <p>There should be an inset map to clearly show the boundaries of this site. (BC test)</p>	Agreed	<p>GAM5 renamed “New Employment Site Mill Hill Allocation”</p> <p>A new map has been added with the location of existing employment sites and policies GAM4 and GAM5.</p>
GAM5 New Employment Site (policy wording)	<p>The policy, as drafted, does not restrict the amount of employment use allowed in the Mill Hill area. We are not sure that this is what you had in mind but, if you did, it is not something that could be supported by SCDC. We are not sure what your 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 (site coverage) 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 (BC test)</p> <p>There are residential properties including a care home within the boundaries of the area you have</p>	Noted	<p>There is no plan to develop the site comprehensively. The SEA concluded that there are “significant opportunities for the avoidance and mitigation of potential negative effects, as well as opportunities for delivering enhancements through environmental net gain, improvements in green infrastructure provision and the delivery of community infrastructure”. Cumulative impacts will determine how applications can demonstrate:</p> <p>“... that there will be no adverse impact on the rural environment and amenity or property of nearby residents (e.g. unsocial hours of operation, noise impacts, appearance of the development from public roads, damage to buildings and congestion on local roads, due to number, size or weight of vehicles requiring access to the site).</p> <p>All proposals are expected to protect and safeguard landscape features and designations which contribute to visual</p>

	<p>allocated for this new employment site. Whilst recognising that your 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 consider that you should review the extent of what could be allowed by this policy. (BC test)³</p> <p>The policy should more clearly state the role of the VDG – we suggest that it sets out the need for development to follow the principles set out in the VDG. (BC test)</p>		<p>amenity and local distinctiveness, including trees and hedgerows following the principles set out in the Village Design Guide. Development proposals will incorporate climate change mitigation and adaptation measures (e.g. SuDs) through design.”</p> <p>Policy wording for GAM5 and GAM4 has been amended stating the need for development to follow the principles set out in the VDG.</p>
GAM6, GAM7 & GAM8 Community Facilities Justification	<p>The justification section does not read as a clear story as it goes from services such as protecting shops and cultural facilities etc but then mentions the Village Design Guide and green spaces. We suggest that this section could have a different layout so that the supporting text to particular policies is close to the actual policy. Currently you have all the policies grouped together. Your Plan should tell a clear story. The feedback from the community could also be against the relevant policy. (Non-BC test)</p>	Noted.	<p>The justifications section has been reordered to create a better flow. The extract from the VDG has been removed. Additional reference is made to SC/6 Indoor Community Facilities and South Cambridgeshire District Council’s Playing Pitch Strategy. Policy NH/12 Local Green Space was already included.</p>

³ Comments relating to meeting the Basic Conditions test are identified as follows – (BC test) and the other comments as (Non-BC test).

	<p>There is mention of extracts from Local Plan policies which may give a misleading interpretation of what these policies are endeavouring to achieve. Policies SC/4: Meeting community Needs and TI/8: Infrastructure and New Developments are included. Other Local Plan policies are not mentioned relating to green spaces, indoor community facilities etc which would be helpful to include in the supporting text as your policies should be providing locally specific details to the overarching local plan policies to complement them rather than replace. It tells the full story of the policy framework. (Non-BC test)</p>		
<p>GAM6, GAM7 & GAM8 Community Facilities Justification</p>	<p>There is also mention of New Homes Bonus and the Community Infrastructure Levy – the later has not have yet been introduced into South Cambridgeshire. These are linked to Policy GAM6 and GAM9 and GAM10. But why has Section 106 monies not been mentioned here as a means of achieving new community infrastructure? It is important that you are aware of the national regulations concerning S106 contributions.</p>	<p>Agreed</p>	<p>Reference to the New Homes Bonus and CIL have been removed. The justification now refers to receipts from planning obligations.</p>
<p>GAM6, GAM7 & GAM8 Community Facilities Justification</p>	<p>Within this section there is suddenly introduced the former First School field and the importance of saving it from development. If this were introduced with supporting text about open space and placed next to policy GAM 7 it could read better. Likewise, the supporting text about the need for more nursery places and a new doctor’s surgery within the parish should be next to GAM8. This results in a summary in paragraph 4.60 that is covering a wide range of different issues. (BC test)</p>	<p>Noted.</p>	<p>The justifications section has been reordered to create a better flow. We have chosen to keep the existing structure.</p>

GAM6, GAM7 & GAM8 Community Facilities Justification	The supporting text ought to identify whether the site is accessible. It would be helpful to show where the pedestrian access is to be and justification for access – does it already exist. This could be in the supporting text rather than the policy itself. LGS does not need to have public access but the supporting text indicates that it is the school playing field of the former First School for which you have another policy in your Plan. (BC test)	Noted	Supporting text now states that the field is accessible from Cinques Road (via a car park) and Green End.
GAM6, GAM7 & GAM8 Community Facilities Justification	We suggest that you could mention in the supporting text what a Local Green Space is and rather than reinvent words use those we have in the Local Plan - say that a LGS must be demonstrably special to the local community and hold a particular local significance. Criteria for assessing from NPPF para 100. (BC test)	Agreed.	Wording changed.
GAM6, GAM7 & GAM8 Community Facilities Justification	Either in the Plan or a supporting evidence document you should identify how the LGS meets the requirements of the NPPF. Were other sites assessed and found wanting? The assessment for this site will need to be in the evidence base of the Plan. There is also on Map 9 sites shown as ‘public open space’ – there does not appear to be a policy to protect these sites too? (BC test)	Noted	The justification demonstrates historic community use. It notes that in 2019, 524 people signed a petition to retain the First School field as a formal recreation space for sport and informal recreation use in perpetuity. Our October 2019 consultation showed that 64% of respondents supported this policy.
GAM6 Community Amenities and Facilities (policy wording)	Is this policy saying anything specific for Gamlingay or is it just repeating the Local Plan protecting services and facilities (SC/3) or meeting community needs (SC/4)? What is specific for Gamlingay?	Noted	The specific elements for Gamlingay are the provision of sports pitches and contributions towards infrastructure for walking, cycling and horse riding.

	... The Local Plan policy has more specific matters that must be taken into account in policy SC/3 to protect services and facilities and could be easier to implement than this policy. (BC test)		
GAM6 Community Amenities and Facilities (policy wording)	<p>The policy assumes that all new residential and business development will have a detrimental impact on community facilities – from the impact from a small extension to a new housing estate. The requirement for all development to contribute towards new community facilities is not consistent with government regulations as set out in Reg 122 of the Community Infrastructure Levy Regulations 2010. It states that planning obligations must be:</p> <p>i. Necessary to make the development acceptable in planning terms ii. directly related to the development; and iii. fairly and reasonably related in scale and kind to the development.</p>	Noted	<p>Policy wording clarified: all new residential and business units are expected to contribute (not extensions) towards infrastructure for walking, cycling and horse riding. The principle of investing in walking and cycling to make development acceptable was established with the appeal decision for the West Road development which secured funding for a feasibility study.</p> <p>New Appendix 3 sets out how proportionate costs for housing and employment (business) development have been calculated.</p>
GAM6 Community Amenities and Facilities (policy wording)	<p>There are some terms included in the policy that need to be defined</p> <p>i. What is meant by reasonable efforts? ii. What is meant by the term ‘commercial’ in the first sentence? iii. What is meant by new community facilities in the second section of the policy?</p>	Noted	<p>For simplicity:</p> <ul style="list-style-type: none"> • The word ‘reasonable’ has been deleted • The first sentence including the term ‘commercial’ has been deleted <p>Infrastructure replaces ‘new community facilities’</p>
GAM6 Community Amenities and Facilities (policy wording)	The policy also has mentioned additional sports pitches and we cannot see any supporting text relating to this? As part of the evidence base of the Local Plan we have a Playing Pitch strategy which	Agreed	The justification has been amended to make the case for additional sports pitches and references the Playing Pitch Strategy.

	indicated whether parishes required more playing fields. There will need to be justification of the need for additional sports pitches. Here is a link to the playing fields strategy		
GAM7 Local Green Space (policy wording)	We suggest that the wording of the policy be amended to read as follows ' In accordance with Policy NH/12 in the adopted Local Plan the site xxx is designated as a Local Green Space (LGS) as shown on Polices Map ' It would help those who do not know the parish to have an inset map near to this policy to show clearly the boundaries of this site and where it is within the village. The site appears to be shown on Map 9 but the key is not clear. (BC test)	Agreed	Have added suggested text.
GAM8 Reuse of First School Buildings (policy wording)	A criteria-based 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.	Noted	We do not support a criteria-based policy. We are supportive of nursery use and the shortfall of nursery spaces in the parish is stated in the Chapter 2: local infrastructure and in the policy justification.
GAM9 Transport Provision on Developments (policy wording)	For the first part of policy – Surely any new housing is going to be relatively close to village facilities? Are there many opportunities for additional cycle ways, footpaths within the village – how much development is proposed? Are these the lines shown on the Map 10 as GAM9 is not shown in the key? This is in our opinion a very open-ended policy. You should include in the policy that any new transport provision should be in line with adopted guidelines /standards. (Non-BC test)	Noted	This policy is deliberately open ended. Wording has been amended to refer to adopted guidelines set out in Local Transport Note 1/20 on cycling and the Manual for Streets

<p>GAM9 Transport Provision on Developments (policy wording)</p>	<p>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. The focus of government concerns on level multi use surfaces applies to schemes in areas with relatively large amounts of pedestrian and vehicular movement, such as high streets and town centres (outside of pedestrian zones). The clause does not apply to streets within new residential areas, or the redesign of existing residential streets with very low levels of traffic, such as appropriately designed mews and cul-de-sacs’</p>	<p>Noted</p>	<p>The Government’s pause on ‘shared spaces’ is focused on public realm projects. However, level surfaces are increasingly common in residential areas and the issues are the same. For example, two tone level surfaces in the Stubbs Oak development resemble parking bays and cars park on space allocated for pedestrians. Although the development as a whole is successful (e.g. the design of the buildings) this in turn puts pedestrians who may have impaired vision in the pathway of vehicles (even if vehicular traffic is low). The provision of kerbs ensures a safe space to walk for all pedestrians.</p>
<p>GAM10 Contributions towards Gamlingay’s cycling and Footway Improvement Plan</p>	<p>Policy GAM10 mentions the Gamlingay Cycle and Footway Improvement Plan which is a Sustrans document relating to the feasibility of a cycle route between Gamlingay and Potton. We can see no reference in either the Plan nor the Sustrans document that relates to other new paths/networks that are intended being funded by the contributions. Perhaps the Policy should be more specific about its primary objective (i.e. the Gamlingay to Potton route) but also say it relates to the wider network.</p>	<p>Agreed</p>	<p>Clarity was needed. The Sustrans study was a first step. This Plan takes ambitions further and sets out a wider network for walking, cycling and horse riding. GAM10 has been renamed ‘Contributions towards providing new infrastructure for walking, cycling and horse riding’.</p>
<p>GAM10 Contributions towards Gamlingay’s cycling and Footway Improvement Plan</p>	<p>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</p>	<p>Noted</p>	<p>New Appendix 3 explains how developer contributors have been calculated. We cannot anticipate the level of contributions over the next 10 years. As this is a Parish Council project</p>

	<p>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)</p> <p>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)</p>		<p>alternative funding sources will also be explored.</p>
GAM10 Contributions towards Gamlingay's cycling and Footway Improvement Plan	<p>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 that an examiner would expect an answer on.</p>	Noted	<p>A footnote has been added stating that the plan for new walking, cycling and horse riding infrastructure is a local ambition and has not been adopted by Central Bedfordshire Council or Cambridgeshire County Council.</p>
GAM11 Landscape and Natural Environment (policy wording)	<p>It will be important to demonstrate how this policy is different to the Biodiversity policy in Local Plan. Recreation Grounds, community orchards and allotments are protected by Local Plan policy SC/8. The policy states that only housing and employment developments should not obstruct, or damage valued sites referred to – surely all development</p>	Noted	<p>No additional policy will be added on Wildlife Corridors. The policy has been amended in line with the recommendation from the SEA:</p> <p><i>“Developers are required to deliver measurable, proportionate and appropriate biodiversity net gains (in line with national</i></p>

	<p>should protect these sites? Have you a map showing the wildlife corridors in the parish? Could this policy be re-worded to create a green network in the parish. 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. As currently worded, it is repeating some local plan policies and there is an opportunity to create a distinctive Gamlingay policy. Policy SC/7 outlines what open space all new housing development must contribute to. (Non-BC test)</p>		<p><i>policy and via the application of a biodiversity metric tool) through design, preferably on the application site will protect and where possible enhancing the wildlife value on the application site, its perimeter and where it connects to key 'wildlife corridors' (e.g. maintaining and improving hedgerow connectivity)."</i></p> <p>The Cambridgeshire Green Infrastructure Strategy is introduced in the first paragraph of the justification. Reference to Policies SC/7 and SC/8 has been added to the justification for policy GAM6 community facilities and amenities.</p>
GAM11 Landscape and Natural Environment (policy wording)	<p>The policy states that green spaces should be consolidated – it would help if you had a green infrastructure map or network to show where existing green space is within the parish? If you want a green network/ corridors for the parish need to have a map showing this included in the Plan – VDG does show open space on page 14 so include in this in the Plan to give added weight to protection of corridors. VDG talks of green fingers of landscape from centre of village to rural edge – these could be shown in a map in this Plan. (BC test)</p>	Noted	Map 4 shows greens spaces in the parish.
GAM11 Landscape and Natural Environment (policy wording)	<p>It is unclear whether this is the policy that is protecting the protected views and vistas? Such views have been shown on several maps throughout the Plan but not explained. We suggest that there is either a separate views policy or it is clearly set out as a section of this policy. If views are to be</p>	Noted	GAM 3 protects the settlement gap. GAM11 protects the views and vistas. The views and vistas are publicly accessible – additional information is provided in Appendix 2 and there is stronger cross-referencing across the justification for Local Character and Natural

	protected, you will need to include a clear map with a list summarising why each is special to justify their inclusion in the Plan. Currently the Plan simply includes a list in an appendix and cross refers to the VDG in the policy. The views will have added weight if considered in your Plan. It would help to give each view a unique reference so that it can easily be referred to in future reports. We would expect views to be from publicly accessible locations in the village Some of those shown on Map 4 look to be in middle of fields? Views appear to be to north and east of village. The policy protecting the hamlets is to the west and south so does this leave any room for future development? Developers could question the sustainability of your Plan if too much is protected. Where would future development be located? (BC test)		Environment policies. Residential development is expected to take place within the village framework.
GAM12 Gamlingay Wood paragraph 4.87	Ancient woodland is protected in Local Plan – Policy NH/7 – this fact could be included in the supporting text. (Non-BC test)	Noted	Policy NH7 of the Local Plan is already referenced in the justification for GAM12.
GAM12 Gamlingay Wood paragraph 4.87	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 the 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)	Noted	The justification has been amended to further clarify the purpose of the 200m cordon which is to will protect and promote the recovery of the flora and fauna of Gamlingay Wood. Development within the cordon will only be supported where it is of conservation benefit or supports existing farming activities.

Strategic Environmental Assessment	We note that the SEA suggested that your Plan could include a policy which specifically focuses on the protection and enhancement of both designated and non-designated heritage assets within the parish (See page 29 paragraphs 5.23 -5.24). It was suggested that the policy could be supplemented with site specific mitigation measures for the proposed Rural Business Development Areas. There were examples given of criteria for the policy. We consider that the Plan could benefit if such a policy were added.	Noted	No additional policies are being created. The justification for GAM3 Local Character has been amended to emphasise the built heritage and the justification for the Local Employment sites has been amended to encourage the archaeological investigation of the Mill Hill site (GAM 5) in line with SEA.