

# Swaffham Bulbeck Neighbourhood Plan Reg. 16 Publication: Representations Received

ECDC published the draft Swaffham Bulbeck Neighbourhood Plan for the period 7 July to 18 August 2022. The table sets out all comments received from ten separate individuals/organisations during the publication period.

Ref	Name	Date received	Comments
1	Emma Wood  National Highways	15 July 2022	<p>Please find below the National Highways comments for the Swaffham Bulbeck Neighbourhood Plan consultation.</p> <p>Swaffham Bulbeck is a settlement north of the A14. The draft plan refers to relatively small housing sites, that are unlikely to have an adverse effect on the Strategic Road Network. However National Highways will assess and make comment on any subsequent planning applications through the usual planning process, as and when these sites come forward. Whilst National Highways have no comment to make on the specific proposals or policy, we are supportive of the principle of developing the local cycling/pedestrian infrastructure.</p> <p>Overall, we offer <b>no comment</b> on the Swaffham Bulbeck Neighbourhood Plan.</p>
2	Tor Taylor  Haddenham Parish Council	18 July 2022	<p>Thank you for notification of the submission of the Swaffham Bulbeck Neighbourhood Plan for independent examination.</p> <p>Haddenham Parish Council appreciate the work that will have gone into putting the Plan together. The Council have no comments to make and wish Swaffham Bulbeck PC every success in having the Plan progressed.</p>
3	Deb Roberts  The Coal Authority	19 July 2022	<p>Thank you for your notification below regarding the draft Swaffham Bulbeck Neighbourhood Plan Consultation.</p> <p>The Coal Authority is only a statutory consultee for coalfield Local Authorities. As you are aware, East Cambridgeshire District Council lies outside the coalfield, therefore there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.</p> <p>This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>
4	Public Health Cambridgeshire CC	19 August 2022	<p>Thank you for consulting Public Health with regard to the Neighbourhood Plan. (NP) The policies within the plan are clearly centred on a strong evidence base using the Local , Census data, population (data verifying both the declining younger and aging population) and local school data The process of gathering this evidence has involved extensive community consultation to help</p>

		<p>understanding the key issues facing residents, vitally important for the development of the plan. The various partners who have contributed to the may wish to include further supporting evidence from the Cambridgeshire Joint Strategic Needs Assessment (JSNA).</p> <p><b>Community Actions</b></p> <p>The inclusion of a number of Community Actions usefully supports the NP with many issues contributing to health and wellbeing. By setting out these Community Actions within the Neighbourhood Plan they have the potential to support the Local Plan and may benefit the parish community.</p> <p>The NP states that residents wish to protect the existing dispersed nature of the parish with its open spaces for recreation. Open spaces have proven health benefits and can make a positive contribution to both national and local health and wellbeing programme. For example, addressing obesity by encouraging physical activity.</p> <p>The NP recognises the importance of a further community asset beneficial to the health of both community residents and visitors - Green Infrastructure: <i>“Identifying, designating and protecting green infrastructure highly valued by the community has emerged as a key issue for residents along with enjoying the countryside across the parish.”</i></p> <p>We welcome the aspirations of the local community to secure multi-purpose indoor space local residents and potentially refurbish or a replace the existing facilities, along with support from residents <i>“to maintain and/or enhance ease of access to local facilities such as the allotments and library facilities”</i>.</p> <p><b>Community Land Trust</b></p> <p>The summary of the role of the Swaffham Bulbeck community Land Trust, with a primary object of providing of housing for the benefit of people with a local connection is particularly welcome from a Public Health perspective. The Trust will strongly supporting the overall sustainability of the community, bringing with it health and wellbeing benefits for local people. Encouragingly, the NP provides detail and a policy SWB7 for the community led housing proposals, such as bringing forward affordable housing for local people as part of the Cemetery/Pony field site. Along with policy SW8 Development sites. These policies contribute to one of the priorities of the Cambridgeshire and Peterborough Health and Wellbeing Strategy PRIORITY 1: Places that support health and wellbeing. – <i>“Housing developments and transport which support residents’ health and address climate change”</i>.</p> <p><b>Building for a Healthy Life</b></p> <p>The NP helpfully includes details of the “Building for a Healthy Life” design code setting out standards for well-designed homes and neighbourhoods and written in partnership with Homes England, NHS England and NHS Improvement. This contains 12 considerations organised across 3 themes which are set out in useful table in paragraph 5.4.8. This clearly illustrates the links between all these issues impacting on the wider determinates of health.</p> <p>Landscape Character Assessment and Fringe Sensitivity Assessment</p> <p>These supporting documents divide the parish into seven distinct areas and a further seven different parcels. This process clearly supports the NP by focusing on the advantages of the unique local landscape such as the availability of the open green</p>
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- **THEME 5 - A cohesive and environmentally friendly community**

The policies in THEME 5 focusing on:

- retaining and enhancing facilities, services and employment opportunities
- active promotion of low carbon emission strategies - transport, construction and active travel
- conservation initiatives and the active promotion of new biodiversity

**Other issues for consideration**

1. Broader impact of traffic

In line with many rural communities in the county, local residents have concerns around four related issues:

- Traffic Speed in the village centre and the surrounding roads
- Traffic levels on B1102 difficulties in crossing the roads
- pollution and
- noise levels

Addressing each of the issues may require the further often broader, technical evidence. This evidence will support the NP, by building on that collected as part of the consultation process and helping design practical and deliverable solutions, that meet the community's needs.

For example, in terms of pollution levels a number of other rural parishes such as Haddenham and Bulwell currently have diffusion tubes monitoring traffic pollution, helping to provide accurate emission data and providing evidence for potential interventions. The community may wish to consider approaching East Cambridgeshire Council with a view to potentially involving the community in monitoring local air quality close to the "*problematic routes through the village*", raised in the NP "*such as: avoiding the village centre via a by-road along Abbey Lane/White Drove*". This may help to understand of the broader impacts of the traffic on the community ". However, such baseline data need to be benchmarked against the data collected from the nearest Air Quality Management Area (AQMA) currently some distance from the parish.

Equally analysing the road safety data available from the Vision Zero - Cambridgeshire and Peterborough may provide further evidence for road safety interventions. In both cases it to liaise with the lead officers from each of the above disciplines, with a view to introducing measures that benefit the local environment and encourage safe active travel, improving health and wellbeing across the local communities.

**2. Access to Community Services**

The NP recognises the importance of access to services, particularly for the large number of elderly residents and how imperative these services are to "*the social life and community cohesion*" Although the NP mentions the two closest GP practices and the remaining shop and public house, in the parish, no reference is made to access to the main hospitals in Cambridge for those residents without a car. This could be illustrated in terms in the section of the NP relating to public transport.

			<p><b>3.Active Travel</b></p> <p>Many positive references are made to active travel throughout the document and are particularly welcomed by Public Health. The supporting text of policy SWB 13 Protecting and Improving walking and cycling connectivity in our parish, illustrates a series of potential improvements that could be made to the network along with a proposal by the Greater Cambridge Partnership (GCP) to deliver improved cycle and walking infrastructure through the Swaffhams Greenway project .</p> <p>Policy SWB 14 further supports active travel setting out the rural footpath network, usefully connecting to earlier references in the NP to improvements the surface of cycle and pedestrian routes along with and the introduction of new links. These local active travel routes also link to both National cycle route 51 that crosses the village and a local cycle map illustrates a route from the outskirts of Cambridge to the east of Bottisham in the direction of Swaffham Bulbeck. (Future editions of the map could potentially include the village and the links to Newmarket).</p> <p>In respect of encouraging safe active travel it would be useful to establish if the County funding for provision of a staggered junction at the Swaffham Heath Road/A1303 incorporates safety measures cyclists as the road provides a further link to and from Newmarket.</p> <p>Support for issues to encourage active travel can also be found in:</p> <ul style="list-style-type: none"> <li>• The emerging countywide Active Travel Strategy</li> <li>• The Transport and Health Joint Strategic Needs Assessment (JSNA )and</li> </ul> <p><b>4. Non Planning Community Aspirations</b></p> <p>The inclusion of a number of community aspirations. These include “Exploring the options” for:</p> <ul style="list-style-type: none"> <li>• dedicated cycle paths</li> <li>• the provision of a community pavilion facilities, and</li> <li>• Improvements to the Public Rights Of Way (PROW) for active travel</li> </ul> <p>All clearly contribute to health and wellbeing.</p>
5	Chris Partrick	29 July 2022	<p>Further to the current NDP consultation process, I would comment as follows. Clearly any NDP which promotes heritage protection as one of its core objectives is welcome from my perspective, but I do feel that the current document has a disproportionate landscape bias, perhaps inevitable given its authorship. Swaffham Bulbeck’s built environment is as important as its landscape setting, and is the critical element which any development must integrate with. To that end I would like to see a stronger emphasis in the NDP on the value and sheer density of the parish’s built heritage.</p> <p>Earlier NDPs have pre-dated the county-wide 2021-22 Cambridgeshire Local Heritage Project (see link below) but the Swaffham Bulbeck NDP is ideally timed to make sure that local, non-statutory heritage is fully acknowledged and valued in its content. The extant 2017 ECDC Register of Buildings of Local Interest (which barely touched Swaffham Bulbeck) is fixed, but a 2022 survey has</p>

			<p>provisionally identified 24 candidate sites, which I think is a more accurate reflection of the scope of the parish's built environment (not all of which is 'historic'). Full details are available by registering on the CLHP website, but I would be happy to discuss this further with the NDP working group. I should stress that none of these sites have been through public consultation or a formal adoption process as yet, but some have been reviewed against the project's scoring system and all those so far have met its eligibility criteria.</p> <p>In terms of the NDP document, I do not envisage that these amendments should substantially lengthen the text. It would be sufficient to include a map appendix and a reference to the aims of and objectives of the CHLP, with a link to its web database. Indeed I am strongly opposed to the publication of time-specific 'lists' in planning documents as they are always a hostage to fortune; a local list is a process, not a document, and it should always be dynamic and subject to change.</p> <p><a href="https://local-heritage-list.org.uk/cambridgeshire">https://local-heritage-list.org.uk/cambridgeshire</a></p>
6	Rachel Earl Wicken Parish Council		<p>Good afternoon</p> <p>Wicken Parish Council has reviewed the draft neighbourhood plan for Swaffham Bulbeck and supports Swaffham Bulbeck Parish Council in their plans.</p>
7	Janet Nuttall  Natural England	18 August 2022	<p>Thank you for consulting Natural England on the publication of the Swaffham Bulbeck Neighbourhood Plan. Further to our response to the consultation on the pre-submission Plan (16 September 2021, ref. 367397) we have no substantive comments on the Submission Plan; however, we support Policy SWB 8 requirements to ensure that housing development contributes positively to the local landscape setting and provides informal open space or alternative mitigation to minimise the effects of increased recreational pressure on nearby Devil's Dyke Site of Special Scientific Interest (SSSI).</p> <p>I hope the above is helpful.</p>
8	Merritt Giles and Clare	18 August 2022	<p>Below is our representation for the Swaffham Bulbeck Neighbourhood Plan which is currently submitted to ECDC for examination. We live in Swaffham Bulbeck and have done since 2005.</p> <p>We support the Neighbourhood Plan in principle and also have the following comments.</p> <p>Development</p> <ul style="list-style-type: none"> <li>• Whilst we support the provision of housing on the pony/ cemetery field (5.8.3), we believe the number of proposed homes (45) is too high for the site. We support the provision of affordable housing. All new homes must be wildlife friendly with the incorporation of bat boxes and house martin nest cups and swift bricks. Garden fences must have gaps for hedgehogs. The proposed open space should include at least one pond. Any lighting for the development must be</li> </ul>

			<p>carefully sited and shielded to protect the night sky from light pollution. Ideally, it should be switched off between 1am and dawn.</p> <ul style="list-style-type: none"> <li>We do not support housing to be built on land east of Heath Road (5.8.15) as this would detract from the open country views and setting of this location.</li> </ul> <p>Facilities</p> <ul style="list-style-type: none"> <li>We support the demolition of the existing pavilion (5.10.5) and construction of a new facility better suited to the needs of the community.</li> </ul> <p>Walking and cycling</p> <ul style="list-style-type: none"> <li>The ‘Cemetery bends’ (B1102) are dangerous and very unpleasant for cycling (5.11.1) and invite dangerous, close overtaking by impatient drivers. We support the provision of a safe, separate cycleway preferably in the field to the north of the bends. This would connect the cycle way from Lode to that towards Swaffham Prior, effectively bridging the current missing link.</li> <li>Whilst we support the move from petrol, to electric vehicles, new charging points (5.12.8) must not be located on pavements, as this reduces space for pedestrians and makes it difficult for wheelchair users and parents with prams. Most pavements in the village are very narrow and so these facilities must be placed on the roadways.</li> <li>We support the desire to create a public footpath/ cycleway (6.14) to Swaffham Prior, away from the busy B1102 which is very unpleasant to walk/ cycle alongside.</li> <li>We support the upgrade/ widening the cycle paths to Bottisham and to Lode which are currently much too narrow, often overgrown, unpleasant and not fit for purpose.</li> <li>We support the creation of a cycle path from Heath Road, Swaffham Prior, to Newmarket which is our nearest town and currently very difficult to reach by bike. The pedestrian bridge over the A14 could be upgraded and a cycle route created across Newmarket Heath into town.</li> <li>We support the upgrade of the public footpath between Lug Fen Droveaway, Lode and Baits Bite Lock to become a cycle path, as this would open up the riverside cycle path into Cambridge as well as providing access to Waterbeach railway station.</li> <li>All cycle paths alongside roads must have clearly marked priority over side roads at junctions.</li> </ul> <p>NON-PLANNING COMMUNITY ASPIRATIONS</p> <ul style="list-style-type: none"> <li>We support further consideration being given to the issues related to inconsiderate parking near the school at start and end of school day- as a pedestrian or cyclist visibility is lacking. As a driver if one has to drive that area at that time, it is very difficult to do so as the roads are blocked and visibility is restricted.</li> </ul> <p>Other</p> <ul style="list-style-type: none"> <li>We support the removal of traffic calming in Stow-cum-Quy as it has created ‘rat-running’ along our High street and on the road to Bottisham as drivers seek to avoid Quy.</li> <li>The new streetlighting is very bright and intrusive and adds considerable light pollution to the night sky as well as being harmful to wildlife. We support dimming or switching off streetlights between 1am and dawn and removing many unnecessary lamp posts altogether.</li> </ul>
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9	Simon Butler-Finbow	18 August 2022	<p>I am emailing on behalf of the Landowners of the proposed allocation within the Neighbourhood Plan (SWB 8 - Cemetery/Pony Field - the Site).</p> <p>The Site is achievable, suitable, available and deliverable, as fully demonstrated by it being a draft allocation in the submission stage of the ECDC Local Plan in 2019 until it was (for reasons not related to Swaffham Bulbeck) subsequently withdrawn in early 2020.</p> <p>The supporting evidence to the Neighbourhood Plan also clearly demonstrates the Site's appropriateness to deliver much needed social, economic and environmental benefits to the community.</p> <p>The Landowners have fully supported the delivery of a scheme which benefits the community, both when the Site was an allocation in the withdrawn Local Plan and now in its current form within the Neighbourhood Plan.</p> <p>The wider aspirations of the Neighbourhood Plan are welcomed albeit the opportunity to comment further on these and the allocation is respectfully requested during the remaining stages of the Neighbourhood Plan process. As such, please keep us informed and notified of the process going forward.</p> <p>Thank you in anticipation of your assistance with this matter which is much appreciated.</p> <p>If any information is required please do not hesitate to contact me.</p> <p>Look forward to hearing from you.</p>
10	East Cambridgeshire District Council	18 August 2022	<p>This letter sets out East Cambridgeshire District Council's (ECDC) response to the Draft Swaffham Bulbeck Neighbourhood Plan (SBNP) which was submitted to ECDC on 30 June 2022, and undergoes public consultation between 7 July and 18 August 2022.</p> <p>Having carefully reviewed the Draft SBNP, ECDC consider it capable of satisfying the basic conditions and other relevant legal obligations, and consequently makes only limited comments in this representation.</p> <p><i>Policy SWB1 – Swaffham Bulbeck Development Envelope</i>  ECDC raises no objections to this policy or the associated small adjustment to the development envelope, which, once made, will take precedence over the current Development Envelope set by the Local Plan 2015 policy GROWTH 2.</p> <p>However, to avoid any confusion over the application of the policy, it may be helpful if the second bullet point read:</p>

		<p>“community-led developments (as defined by Policy SWB7)”</p> <p><i>Policy SWB5 – Local Green Spaces</i>  ECDC has no objection to the policy, indeed supports it, and notes the submitted justification report for the allocation of such sites. However, it raises the issue that site (b) (Gutter Bridge Wood) is located in the Green Belt, where special national policy applies. Whilst the proposed Local Green Space policy is a generally protective policy, and also benefits from its own national policy which is akin to Green Belt policy, there is potentially a small risk of confusion as to what policy position takes primacy on this particular parcel of land, if designated as both Green Belt and a Local Green Space. There may be benefit in removing this site as an LGS to avoid any such confusion (albeit accepting that the risk of development taking place on this land, which is controlled by the parish council and the National Trust, appears very remote).</p> <p><i>Policy SWB6 – Housing Mix</i>  ECDC raises no objections to this policy, and notes the requirements associated with the M4(2) standard. During the course of the consultation period, government announced its intention to mandate M4(2) through the building regulations system, but did not stipulate a timeframe for doing so (<a href="https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes">https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes</a>). As such, ECDC sees no reason why the policy should be amended at this stage (because there could be a considerable period before the building regulations are mandated), and further sees no potential future conflict between the policy and the building regulations, should government proceed to mandate the requirement.</p> <p><i>Policy SWB7 – Community-led development</i>  This policy is similar in intent to Policy GROWTH 6 of the Local Plan, but has been refined for the purpose of dealing with such community-led schemes in Swaffham Bulbeck parish. Consequently, ECDC raises no objections to it.</p> <p><i>Policy SWB8 – Cemetery/Pony Field Site</i>  The East Cambridgeshire Local Plan 2015’s locational strategy concentrates the vast majority of development in the district’s market towns, and does not identify a specific requirement for growth in Swaffham Bulbeck.</p> <p>However, Neighbourhood Plans are an important mechanism for delivering growth. The government’s Planning Practice Guidance states that Neighbourhood Plans can allocate additional sites to those in a local plan (Paragraph: 044 Reference ID: 41-044-20190509). Therefore, the inclusion of the Cemetery/Pony Field Site for the development of up to 45 dwellings is, in principle, welcomed.</p> <p>ECDC notes, and welcomes, a refinement of the Policy since its earlier draft, with it now incorporating measures as recommended in the Environment Report (submitted document 4(a)). That said, criterion 2 of the submitted policy is not</p>
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		<p>written exactly as recommended by the Environment Report. Whilst the recommendations of the Environment Report need not be replicated exactly in the policy, ECDC requests the following two adjustments to the policy as submitted:</p> <p>(a) Removal of “(in agreement with Natural England)”. This request is made because, ultimately, it will be ECDC, as local planning authority, that will determine any planning application, and consequently it will be ECDC (as a competent body) that will be in a position to determine whether any mitigation measures are appropriate. Of course, Natural England will no doubt be consulted on any proposal, and its advice carefully considered, but the policy should not be written in a way to falsely place the agreement on the mitigation measures at the discretion of Natural England rather than the local planning authority (namely ECDC).</p> <p>(b) Replace, at the end of the criterion, “on the SSSI” with “on nearby sensitive sites designated for nature conservation”, in line with the phrase set out in the Environment Report recommendation. This adjustment will ensure that any development proposal (and those charged with determining such proposals) do not focusses entirely their thinking on the local SSSI (which, incidentally, is also, in part an internationally designated SAC), but also reflect on wider designated nature conservation sites (local to international) that may have the potential to be impacted by the proposal.</p> <p><i>Policy SWB12 – Delivering Sustainable Design</i> ECDC particularly supports, in principle, this policy, and considers it to be consistent with ECDC’s wider environmental ambitions for the district as a whole.</p> <p><i>Other Policies in the Draft SBNP</i> ECDC has no representations to make in respect of any of the other policies in the Draft SBNP, but generally commends the content and layout of the Plan, as well as the submitted evidence base.</p> <p><i>Strategic Environmental Assessment (SEA)</i> ECDC is the “responsible authority” for the purpose of SEA.</p> <p>ECDC has issued a Determination Statement (submitted document 4(d)) which confirms it is satisfied that implementation of the SBNP is not likely to give rise to significant effects on the environment.</p> <p>That general position is not affected by the couple of adjustments recommended by ECDC to policy SWB8, as set out earlier in this letter. To put it another way, ECDC’s position is that the SBNP is not likely to give rise to significant effects on the environment, irrespective of whether the recommended adjustments to policy SWB8, as set out in this letter, are recommended or not by the Examiner.</p> <p><i>Conclusion</i></p>
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