

## **SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL**

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<b>REPORT TO:</b>	Council	15 November 2005.
<b>AUTHOR:</b>	Director of Development Services	

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### **SOUTH CAMBRIDGESHIRE LOCAL DEVELOPMENT FRAMEWORK: CORE STRATEGY DPD, DEVELOPMENT CONTROL POLICIES DPD AND SITE SPECIFIC POLICIES DPD: PRE-SUBMISSION DRAFTS**

### **RESPONSE TO REPRESENTATIONS AND PROPOSED CHANGES**

#### **Purpose**

1. For Members to consider representations to the Pre-Submission draft Core Strategy Development Plan Document (DPD), Development Control Policies DPD and Site Specific Policies DPD and agree proposed responses to them. Members are also asked to agree the resulting proposed changes to the draft DPDs and to submit the DPDs to the Secretary of State in January 2006.

#### **Effect on Corporate Objectives**

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| 2.                                                 | <table><tr><td>High quality, accessible, value for money services</td><td rowspan="4"><ul style="list-style-type: none"><li>• Assist the Council's objectives to deliver quality accessible development in the district</li><li>• Include the provision of affordable housing and the effective delivery of sustainable development at Northstowe and other major developments on the edge of Cambridge and development of sustainable communities</li><li>• Assist the delivery of the Community Strategy</li><li>• Be used by Cambridgeshire Horizons to help the early and sustained development of the necessary services and infrastructure.</li></ul></td></tr><tr><td>Quality village life</td></tr><tr><td>A sustainable future</td></tr><tr><td>A better future through Partnerships</td></tr></table> | High quality, accessible, value for money services | <ul style="list-style-type: none"><li>• Assist the Council's objectives to deliver quality accessible development in the district</li><li>• Include the provision of affordable housing and the effective delivery of sustainable development at Northstowe and other major developments on the edge of Cambridge and development of sustainable communities</li><li>• Assist the delivery of the Community Strategy</li><li>• Be used by Cambridgeshire Horizons to help the early and sustained development of the necessary services and infrastructure.</li></ul> | Quality village life | A sustainable future | A better future through Partnerships |
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| Quality village life                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                      |                      |                                      |
| A sustainable future                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                      |                      |                                      |
| A better future through Partnerships               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                      |                      |                                      |

#### **Background**

3. Initial consultation took place with stakeholders between 14 April and 12 May 2004 on issues for the first tranche of DPDs under the "jumping the gun" regulations. An additional round of public participation took place on the Core Strategy Preferred Options Report between 1 October and 12 November 2004, involving issues and alternative options for the DPDs. The results of these consultations fed into the Pre-Submission draft Core Strategy DPD, Development Control Policies DPD and Site Specific Policies DPD which were subject to six weeks consultation between 17 June and 29 July 2005.

## Results of Pre-Submission Public Participation

4. Around 1900 representations were received during the Pre-Submission public participation period to the three DPDs a very similar number to that received at the Preferred Options Stage. Of these, approaching 21% were in support. This is quite different from the level of representations for each of the Area Action Plans which are significantly fewer than at the Preferred Options stage. The reason appears to be that a large number of representations on the Core Strategy seeking allocations for development in villages are similar to those raised at the Preferred Options stage and which were not accepted because they were not compatible with the overall policy approach and have therefore been repeated or supplemented at this Pre-Submission stage.
5. Officers have prepared proposed responses to representations on the Core Strategy DPD, Development Control Policies DPD and Site Specific Policies DPD for Members' consideration as set out in Appendices A, B and C respectively. The schedules:
  - a. list all the representations in plan order by policy / paragraph,
  - b. identify the respondent where it is an organisation,
  - c. indicate whether the representation objects to or supports the plan,
  - d. summarise the representation,
  - e. give a proposed officer response
  - f. where any changes to the DPD document are considered appropriate in response to the representation, indicate how the DPD should be amended to address the issue.
6. Further Appendices provide other information to assist Members consider the representations and agree the DPDs for Submission:

Appendix D	A set of maps showing the extent of objection sites arising out of the representations
Appendix E	A 'version of the Core Strategy DPD, which highlights the changes arising from the responses to representations in Appendix A, and includes any resulting changes to the Proposals Map
Appendix F	A version of the Development Control Policies DPD, which highlights the changes arising from the responses to representations in Appendix B.
Appendix G	A version of the Site Specific Policies DPD, which highlights the changes arising from the responses to representations in Appendix C, and includes any resulting changes to the Proposals Map
Appendix H	An index of all those making representations to the draft DPDs for reference
7. The proposed changes to the DPDs have been subject to independent sustainability appraisal by the Council's consultants to assess their impact in sustainability terms. In terms of the Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) the consultants have not identified any significant changes to the previous appraisal of the Pre-Submission documents, although they note some minor improvements in terms of sustainability for some changes and less sustainability benefits in terms of other changes (generally those where environmental requirements have been deleted from policies in response to representations from GO-East that they lie outside the scope of the planning system). New policies proposed have also been subject to appraisal. The consultants have not

recommended any further changes to the Plan. Copies of the SA / SEA schedules are available to view on the Council's website.

8. Officers have prepared proposed responses to representations on the Draft Final Sustainability Report Core Strategy/ Development Control Policies DPD / Site Specific Policies DPDs, and the Sustainability Appraisal Scoping Report.

Appendix I      Proposed responses to representations on Sustainability Appraisal Scoping Report, and Draft Final Sustainability Report Core Strategy / DC Policies / Site Specific Policies DPDs

9. Officers have prepared proposed responses to representations on the Local Development Framework Monitoring Strategy.

Appendix J      Proposed responses to representations on Local Development Framework Monitoring Strategy.

### **Key Issues for Consideration**

10. There are a number of changes proposed to the DPDs in response to representations. These are identified in detail in the schedules at Appendices A, B and C and highlighted in the DPDs at Appendices E, F and G. Members should focus their attention on the representations received and the proposed changes to the DPDs (the struck through and underlined text). However, in order to assist Members, some of the main changes arising from the representations to the Draft Development Plan Documents can be summarised as follows:

#### **Core Strategy DPD**

- The housing land supply information has been updated to the end of March 2005 and continues to demonstrate that the Council can meet its housing guidelines for the different stages in the sequence, ie. in and on the edge of Cambridge, a new town at Northstowe, in rural areas. This is set out and highlighted in the Core Strategy DPD at Appendix E.
- It is proposed to re-categorise Bar Hill as a Minor Rural Centre from a Rural Centre for consistency with the approach to other settlements of similar function.
- A new chapter is included on delivery (Chapter 3) in response to representations from GO-East, which sets out the mechanisms for implementing the DPD and includes a housing trajectory, a requirement of the new plan making system which forecasts delivery of housing on an annual basis in order to demonstrate how the policies of the DPDs will be implemented. There are many outside factors that will influence rates of building and the chapter highlights these.
- A new chapter is included on monitoring (Chapter 4) in response to representations from GO-East, which highlights the importance of the plan, monitor and manage approach and sets out the indicators that will be used to monitor delivery of development. These will be assessed each year in the Council's Annual Monitoring Report (AMR), another requirement of the new plan making system, and will include a housing trajectory which assesses actual delivery against the policy based trajectories included in the DPDs and take account of any differences in building rates. The AMRs will also identify any issues surrounding policy implementation and propose that DPDs be revised if necessary.

#### Development Control Policies DPD

- In response to several representations from GO-East (concerned that some policies simply repeated Government Guidance – an approach which is contrary to Planning Policy Statement 12: *Local Development Frameworks*) some policies have been deleted, or incorporated into the text of others, or reworded, including policies in the Green Belt and Natural Environment chapters, and policies ET/9: Replacement Buildings in the Countryside, SF/8: Telecommunications, CH/3: Listed Buildings and CH/5: Conservation Areas.
- A review of the Green Belt boundary where it has been extended around Northstowe,
- An extension of the Lord's Bridge Telescope Consultation Area.
- A standard for Strategic Open Space (SOS) is included in response to a representation from the County Council which defines SOS (including publicly accessible, larger open spaces such as country parks), and requires provision of, or contributions to, SOS from new residential development with the aim of ensuring that levels of provision per person is not reduced from current levels.
- Broadening the remit of Policy TR/4: Cycling and Walking Provision to apply to all non-car modes generally, allowing for greater inclusion of horse riders.
- Additional text to explain the application of policies TR/1: Planning For More Sustainable Travel and TR/3: Mitigating Travel Impact in the Travel Chapter, including the additional requirement for a Transport Statement to accompany applications.
- Deletion of Policy TR/6: Eastern Rapid Transit as this infrastructure will be either totally within and serving Cambridge East and has is already incorporated in the AAP or will be within the City Council's area.

#### Site Specific Policies DPD

- As part of the update of the housing land supply information and in response to a number of representations, housing allocations rolled forward from Local Plan 2004 were revisited, including site specific investigations relating to the planning situation and landowner intentions. Where sites now have the benefit of planning permission (as at end of March 2005) they can be deleted as allocations as they are now included in the commitments figures. Some other outstanding allocations are proposed to be deleted because either they are in Group or Infill villages and therefore now contrary to the strategy which focuses housing in rural areas at Rural Centres and Minor Rural Centres, or they are considered unlikely to be developed for site specific reasons, such as an unwilling landowner.
- A new policy is proposed to allocate Bayer Crop Science, Hauxton for mixed-use development in response to the existing uses on the site having ceased in order to provide a policy context for considering proposals on this "island" in the Green Belt lying on a key radial into Cambridge and close to the edge of the City.
- Some additional areas of land for recreational use are included in Policy SP/7 in response to representations from Parish Councils and having regard to the Council's recreation study and existing levels of provision.
- The emphasis in Policy SP/11: Papworth Everard West Central site is proposed to be changed from an emphasis on housing, to give a more even mix of housing, employment and community uses, with the aim of continued invigoration of the village centre.

11. Some of the other main themes of representations, where no changes proposed are:

- Several representations raised concerns regarding housing provision, both in terms of delivery, particularly the delivery of the stated housing numbers at the major development locations of Northstowe and on the edge of Cambridge by 2016, and in terms of insufficient allocations to meet the housing need. Many subsequently sought additional allocations within the rural area to compensate for perceived shortfalls.
- A large number of requests for amendments to the Village Frameworks and/or Green Belt boundaries, some of which also requested the allocation of land for housing development to meet perceived shortfalls.
- Several representations sought amendments to the category of villages, particularly those designated Minor Rural Centres which were felt should be Rural Centres.
- Concerns were raised over the level of development permitted in villages, with the smaller categories of villages seen as being too restrictive.
- The approach to prescribing a market housing mix is challenged as contrary to Government Guidance in several consultation documents, which state the market should determine the appropriate market housing mix. The response clarifies that the market has consistently provided high levels of large houses in rural settlements (around 50% being 4 bedroom or more) and not met local housing needs for more smaller properties in the past 10 years, despite policies in the 1993 and 2004 Local Plans, and that there is flexibility to demonstrate an alternative mix is more applicable based on local circumstances. This policy is intended to rectify an imbalance in provision and will be monitored in the Annual Monitoring Report so that the Council can regularly assess whether the policy is still required.
- The affordable housing target is challenged as being unviable and due to concerns on balanced communities. The response clarifies the high level of housing need in the Cambridge area, the wide range in tenure mix that is included within affordable housing and that the issue of viability will be a factor in determining any planning application at which point all the required obligations on the development can be properly assessed and the appropriate affordable housing provision determined within that context.

## **Next Steps**

12. Members are being asked to agree the Core Strategy DPD, Development Control Policies DPD and the Site Specific Policies DPD at this meeting for submission to the Secretary of State. However, if there are any matters arising from this meeting, they will be brought back to Council at its meeting on 9 December for final agreement. The revised DPDs, together with the Area Action Plans that are the subject of separate meetings of Council, will be submitted to the Office of the Deputy Prime Minister in January 2006.
13. It is proposed to submit the DPDs as three separately bound documents to clarify that they are separate statutory documents and to make review of the individual plans easier in the future. This will require new Introductions to be prepared for the Development Control Policies DPD and the Site Specific Policies DPD. Further minor technical updating will also be required and consistency across the plans will need to be checked to ensure any consequential changes as a result of proposed changes are made. In the case of Site Specific Policies DPD it is also proposed to reorder the plan into chapters which broadly follow the structure of the Development Control Policies DPD to make it clearer. Members are asked to delegate this process to the

Portfolio Holder if it involves and matters of policy and to the Development Services Director for purely technical changes.

14. Submission to the Secretary of State will trigger the start of a further statutory six week period during which representations can be made on the DPDs. Once this consultation period has finished public views will also be sought and considered on any "objection" sites. This includes both new and alternative development sites put forward by objectors to the DPDs and will give an opportunity for third parties to make formal representations before objection sites are considered by the Inspector. This is a new stage under the new plan making system. A public examination is then scheduled for July to October 2006 (with a recess in August) to be chaired by an independent Inspector who will test the "soundness" of the DPDs. Finally the Inspector will produce a binding report which is programmed for March 2007 and the Council will then adopt the DPDs.

### **Options**

15. There are no specific options to put before Members at this stage.

### **Community Safety Implications**

16. None

### **Environmental / Sustainability Implications**

17. Key components of the DPDs will consider matters such as landscape and biodiversity, land drainage and water conservation, energy efficiency and managing waste. The Sustainability Appraisal of the proposed changes to the DPDs did not identify any significant issues.

### **Equal Opportunities Implications**

18. None

### **Financial Implications**

19. The additional round of public consultation occasioned by the September 2004 changes in the Regulations for plan-making has had to be funded from the unspent monies for the Public Examination into the 'soundness' of the plans which has now been postponed to the next financial year. Additional budgetary provision will have to be added to the monies which will be rolled over into 2006/07.

### **Legal Implications**

20. None.

### **Risk Management Implications**

21. The effect of any slippage to the timetable could be significant to meeting the Structure Plan development strategy for the Cambridge area.

### **Staffing Implications**

22. Within existing resources.

### **Conclusions**

23. The Pre-Submission Public Participation has resulted in a positive level of support for many of the policies contained in the draft DPDs and many of the objections received were seeking refinement of policies rather than major changes to them. There has been a significant level of objection raised to the development strategy by the development industry, some of which effectively seek to change the strategy set for the Council in the Structure Plan and are therefore clearly contrary to policy. Others sought to demonstrate that the Council would not meet Structure Plan guidelines as support for alternative sites they are promoting. The review of housing land supply confirms that no further allocations are necessary at any stage in the sequence.
24. A number of representations from GO-East questioned the need for and scope of policies in the DPDs and sought a streamlining of plans and increased emphasis on linkages with other plans and strategies and on implementation and monitoring and these have been addressed through proposed changes to the DPDs. The Sustainability Appraisal of all proposed changes confirms that these do not have any material impacts on the sustainability credentials of the DPDs.
25. The revised DPDs as contained in Appendices E, F and G are considered to be sound plans and ready for submission to the Secretary of State, subject to further refinement as set out in paragraph 11.

### **Recommendations**

26. Members are invited to:
  1. AGREE the responses to representations to the Pre-Submission draft Development Plan Documents (DPDs) as contained in Appendices A, B and C.
  2. AGREE the responses to representations to the Sustainability Appraisal Scoping Report and the Draft Final Sustainability Report as contained in Appendix I.
  3. AGREE the responses to representations to the Monitoring Strategy in Appendix J.
  4. AGREE the proposed changes to the draft DPDs as contained in Appendices A, B and C and incorporated into Appendices E, F and G and that they BE SUBMITTED to the Secretary of State in January 2006.
  5. DELEGATE further minor editing changes to the DPDs to the Planning Portfolio Holder where they involve matters of policy and to the Development Services Director where they are technical matters.

**Background Papers:** the following background papers were used in the preparation of this report:

Pre-submission Core Strategy, Development Control Policies and Site Specific Policies  
DPDs, June 2005

Representations received in response to the above documents.

Revised Sustainability Appraisal

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