

Appendix 2 – Representations and Responses to the Sustainability Appraisal

North West Cambridge Sustainability Appraisal

Public Participation Report

Non-Technical Summary

Environmental Effects

Representations

Nature Representation Summary

Councils Response

Non-Technical Summary

Environmental Effects

3906 - English Heritage (East of England Region)

Object

Sustainability Appraisal (Non-Technical Summary)

* The SA of the Issues & Options acknowledged that environmental objectives "bare the burden of the potential negative impacts". However, the SA argued that the potential economic benefits of the proposed development (relating to the University) extends beyond the local context and affects the whole region and nation. It argued that the negative environmental impacts are more locally based, affecting the landscape characteristics of the local areas including the setting of Girton and Cambridge city, and that mitigation measures could lessen impact.

* The SA of the Preferred Options AAP appears to make no reference to the above setting issues, referring only to the "character of the site". The SA states that the character will be altered and that this is unavoidable as the existing character is agricultural. Whilst this is not in dispute, the SA appears to fail to discuss the negative impact on the wider setting of Cambridge and the Green Belt, with no reference to any mitigation measures. Furthermore, the character of the area is not simply agricultural; it is also historic (with Roman and medieval remnants). The original Scoping Report from August 2006 acknowledges these characteristics and setting qualities, but this does not appear to have translated across to the current SA or AAP.

Concern noted. Some mitigation measures have been recommended in relation to the Green Belt and the wider landscape setting of Cambridge in the main sections of the report. In a Sustainability Appraisal it is not appropriate, and indeed it is often impracticable, to predict the effects of an individual proposal in the degree of detail that would normally be required for an Environmental Impact Assessment of a project. However, with regards to the wider setting of Cambridge and the Green Belt, it is noted that the Sustainability Appraisal of the Preferred Options Report could have gone into a level of detail more akin to that contained within the Appraisal of the Issues and Options Report. The Sustainability Appraisal is one of a number of factors that have been taken into account in developing the preferred options. For example, the Landscape Study carried out by David Brown has also been an important background document in the preparation of the Area Action Plan, and helped to inform the choice of site footprint (for further details please see the "North West Cambridge Area Action Plan Site Footprint Assessment").

Representations**Nature Representation Summary****Councils Response****2. Stage A***Table 2.1*

3341 - University of Cambridge	Object	The AAP identifies the need for development at North West Cambridge to create a new urban edge to the city. As such, development at North West Cambridge is not being treated as a rural development, but as an extension to urban Cambridge. Clear links will be made with surrounding villages, particularly Girton, but the development itself is not rural in nature. It is not clear why amenity in rural areas is a key issue for the North West Cambridge Area Action Plan.	Concern noted. The Sustainability Appraisal was informed by the baseline reviews carried out for the South Cambridgeshire and City Council Scoping Reports and the Scoping Report Addendum, along with updated information from the South Cambridgeshire Annual Monitoring Report, 2005. Cambridge is a city in a rural setting. The landscape in this area, which forms part of the Cambridgeshire Western Claylands, is rural in its nature, with gentle, undulating, open, arable fields, with hedgerows along routes and field boundaries and occasional deciduous woodlands. While we acknowledge that the development at North West Cambridge is not, in itself, rural in nature, the plan must also take into account its wider context.
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Table 2.2 SA Framework

3342 - University of Cambridge	Object	While the University supports the principles set out in Table 2.2: The Sustainability Framework, it is unclear how the 'Relevant Indicators' identified are measured with respect to the AAP. The level of detail provided in the AAP, in particular the two-dimensional site footprint, is inadequate to allow comprehensive assessment on the grounds set out in Table 2.2.	Concern noted. The baseline indicators identified in Table 2.2 were informed by a review of the South Cambridgeshire and City Council Scoping Reports, along with updated information from the South Cambridgeshire Annual Monitoring Report, 2005, which led to the development of a Scoping Report Addendum. It is acknowledged that this list is not exhaustive, and the Sustainability Appraisal consultants have also been provided with additional information in order to help them with their assessment. With regards to the site footprint, the consultants have also carried out a site visit in order to help them better visualise the development area. It should also be noted that section 3.11 of the Sustainability Appraisal does acknowledge that much of the information required to make precise assessments will not be forthcoming until the masterplanning and planning application stages. The AAP is by its nature a strategic document and as such the SA has to make a number of assumptions regarding the policies.
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Representations***Nature Representation Summary******Councils Response****Table 2.3*

3495 - University of Cambridge	Object	<p>The University is committed to delivering appropriate utilities infrastructure to serve the needs of the development. An Environmental Impact Assessment will accompany outline planning applications for the site and ensure that mitigation measures are put in place to minimise any identified adverse impacts of the development.</p> <p>It is unclear how the Sustainability Appraisal has evaluated the impact on views of local landmarks, as the options defined are exclusively two-dimensional and based on a notional site boundary on a plan. To fully understand the impact of built development on views of the City and Girton College a three-dimensional study is required.</p>	<p>Disagree, as table 2.3 is taken from information contained in the South Cambridgeshire District Council and Cambridge City Council Scoping Reports. These documents were prepared by Officers from the Councils and have been influenced by various different plans, strategies and studies, including landscape and Green Belt studies. Consultation on these scoping reports was carried out with the key statutory bodies including Natural England, the Environment Agency and English Heritage.</p>
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Representations**Nature Representation Summary****Councils Response****3. Stage B****Interim Sustainability Appraisal Findings Summary Box**

3486 - University of Cambridge	Object	<p>The only difference identified between Options 10.1, 10.2, 10.3, 10.4 and 10.5 was a site boundary, drawn in two dimensions. It is unclear how the consultants were able to determine overall sustainability impacts based on a site footprint.</p> <p>In addition, conclusions with regard to Option 10.1 are not supported and incorrect. The University believes that Option 10.1 would not dramatically affect the character and setting of Girton. The landscaped urban edge will provide an attractive landscaped setting to Cambridge itself.</p>	<p>Disagree, as the development area differed between each of the site options proposed at the Issues and Options stage, with each option having different impacts on the landscape setting of Cambridge, as highlighted in the Green Belt Landscape Study. Section 3.11 of the Sustainability Appraisal acknowledges that the AAP is by its nature a strategic document for the development of the site. As such, much of the information required to make precise assessments will not be forthcoming until the masterplanning stage. As such the Sustainability Appraisal offers a relative comparison of the site footprint options rather than a definitive one. The Sustainability Appraisal is just one of a number of factors taken into consideration by the Councils in deciding the site footprint, and this has been outlined in the "Site Footprint Assessment" background document to the Area Action Plan.</p>
3.3.7 3487 - University of Cambridge	Object	<p>The University supports 10.1 in meeting both of these objectives. Option 10.1, based on the University's 2005 masterplan which was developed through considerable stakeholder involvement, clearly meets the University's demonstrated need. In addition, the University has demonstrated through technical working that development proposed in Option 10.1 would protect the Green Belt setting of Cambridge.</p>	<p>Concern noted. However this objection would be more suitably directed to the policy contained within the Area Action Plan itself rather than the Sustainability Appraisal.</p>

Representations**Nature Representation Summary****Councils Response***NW4: Site and Setting*

3488 - University of Cambridge	Object	<p>The Sustainability Appraisal for the AAP Preferred Options site footprint assumed that land outside of the footprint will be maintained as agricultural land. This is not viable and all development options result in the loss of agricultural land.</p> <p>As the SA for Policy NW4 has been undertaken based on a two dimensional site footprint, it is incomplete. The University has provided a Sustainability appraisal for its site footprint which has been submitted alongside Preferred Options Area Action Plan representations. This indicates the overall benefits of the University's masterplan and articulates key issues in relation to its proposed footprint.</p>	<p>Agree that continued agricultural use would be unviable on the land North West of the 20m contour, although this land should be preserved as open space to act as a buffer between the site and the M11.</p> <p>It is the role of the Sustainability Appraisal to appraise the plan policies or alternatives, not the masterplan. The Sustainability Appraisal of NW4 has been based on all of the information readily available to the Sustainability Appraisal consultants and it is acknowledged that this is not exhaustive. Section 3.11 of the Sustainability Appraisal acknowledges that due to the strategic nature of the Area Action Plan, much of the information required to make precise assessments will not be forthcoming until the masterplanning stage. The Sustainability Appraisal is just one of a number of factors taken into consideration by the Councils in deciding on the preferred site footprint, and this has been outlined in the "Site Footprint Assessment" background document to the Area Action Plan. This included the 3-D modelling work carried out by the University.</p> <p>With regards to the University's revised footprint submitted to the preferred options consultation, this will be subject to an independent Sustainability Appraisal as part of the preparation of the Submission Draft Area Action Plan.</p>
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NW7: Balanced and Sustainable Communities

3343 - University of Cambridge	Object	<p>The University's masterplan has been developed over the past 3 years in consultation with a range of stakeholders, including both Councils. In discussion with South Cambridgeshire District and Cambridge City council officers in December 2006, the principle of integrated uses throughout the site was established. This runs counter to the new proposals of isolated student housing, which are contrary to previously established development principles.</p>	<p>Concern noted. However this objection would be more suitably directed to the policy contained in the Area Action Plan itself rather than the Sustainability Appraisal.</p>
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NW8: Employment Uses

3344 - University of Cambridge	Support	<p>The University supports the principle of diversification of employment opportunities on the development site to enable future flexibility as markets change.</p>	<p>Support noted.</p>
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<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Councils Response</i>
<i>NW11: Sustainable Travel</i>			
3345 - University of Cambridge	Support	<p>The University agrees with the SA comments that the 40% figure has no provenance.</p> <p>In addition, it is not clear whether the target 40% modal split applies to trips from the site, and/or to the site, and/or to through traffic, how this would be monitored. Normal practice, established by the Travel for Work Partnership, is to monitor journeys to work.</p> <p>Further clarification will be required as to whether the 40% target applies solely to single occupant vehicles. Without that clarification, the policy is ambiguous and could penalise effective travel planning measures such as car sharing and car clubs.</p>	Support noted. Queries with regards to the policy itself should be directed towards the Area Action Plan.
<i>NW12: Highway Infrastructure</i>			
3346 - University of Cambridge	Object	<p>Outline planning applications for the development of North West Cambridge will be accompanied by a full Transport Impact Assessment, which will identify the full impact of development proposals on the road network. Appropriate mitigation measures will be provided in the TIA and integrated into development proposals.</p>	<p>Concern noted, however it is the role of the Sustainability Appraisal to identify measures to prevent, reduce and offset any significant adverse effects of implementing the plan. It is clear that development at North West Cambridge does have the potential to impact on highway infrastructure. The Councils welcome the University's commitment to preparing a full Transport Impact Assessment as part of the outline planning application.</p>

Representations***Nature Representation Summary******Councils Response******Appendix V: Preferred Options Assessment Matrices******Matrix Table - Preferred Option Policy NW2***

3494 - University of Cambridge	Object	Responses to scoring and comments for items 1.1, 2.2, 2.3, 3.2, 6.1.	<p>Point 1.1 - The assessment reflects that the land was previously Green Belt, although it is recognised that the land has now been released from the Green Belt to meet the proven needs of the University.</p> <p>Point 2.2 - The assessment reflects that in the short-term, i.e. during construction, there will be an adverse impact on biodiversity. The Councils acknowledge that the University intends to put a strategy in place to allow for biodiversity enhancement at North West Cambridge. With regards to the medium and long term effects, the Appraisal acknowledges that due to the Strategic nature of the Area Action Plan, and a lack of baseline data regarding ecology, it is difficult to provide a more precise assessment.</p> <p>Point 2.3 - Again the strategic nature of the Area Action Plan makes it difficult to provide a more precise assessment of impact. The assessment acknowledges that more detail would be provided in the masterplan and that any negative effects would be mitigated by policy NW23.</p> <p>Point 3.2 - In the short-term the construction phase will have a negative impact on the landscape, although it is noted that phasing of the development should help to minimise these impacts. With regards to the medium and long-term impacts, the strategic nature of the Area Action Plan makes precise assessment difficult, and impact that would be dependent on the design and massing of the development.</p> <p>Point 6.1 - Agree that the appraisal does not acknowledge the role that the local centre will play in provide accessible local services. A cross reference to policies NW20 and NW21 could have been included here, although it should be noted that the Sustainability Appraisal is just one of a number of factors that have influenced the development of the preferred options.</p>
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Representations**Nature Representation Summary****Councils Response****Matrix Table - Preferred Option Policy NW4**

3492 - University of Cambridge	Object	<p>Response to 1.1: Change of use of the site in accordance with the AAP Preferred Option will result in a loss of agricultural land. Once the site is developed, remaining land adjacent to the M11 will not be retained as agricultural land. The short, medium and long term impacts should be rated "XX".</p> <p>Response to 6.3: As the site footprint identified in the AAP Preferred Options Report is smaller than the University's masterplan, it will be unable to accommodate the University's needs and will not provide for 2,500 dwellings and will be providing significantly less key worker housing.</p>	<p>Concern noted, however the Sustainability Appraisal must look at the performance of policies and proposals against the Sustainability Appraisal framework as a whole in order to balance the environmental, social and economic impacts. While the preferred option might not perform as well against this specific criteria as the University's preferred site footprint, it performs significantly better against some of the other assessment criteria. It is also noted that even the University's preferred site footprint would not provide enough land to accommodate the housing needs of all University key workers.</p>
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Matrix Table - Preferred Option Policy NW5

3347 - University of Cambridge	Object	<p>Response to 3.3:</p> <p>The policy includes a reference to provision of a range of densities through a 'design-led' approach, but makes no other reference to quality of design. It is unclear how the positive assessment was ascertained, particularly as the densities required to deliver PPO NW5 on the site footprint identified in the AAP would result in high density development that is not in keeping with the surrounding area.</p>	<p>Concern noted. However it must be noted that the Sustainability Appraisal, whilst looking at the effects of individual policies, must also look at the cumulative effects of the Area Action Plan as a whole. Other policies within the Area Action Plan require high quality design at North West Cambridge, for example NW2 1(b) and NW4. Section 3.11 of the Appraisal acknowledges that due to the strategic nature of the Area Action Plan, much of the information required to make precise assessments will not be forthcoming until masterplanning, and as such a number of assumptions have been made regarding the policies.</p>
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Matrix Table - Preferred Option Policy NW7

3348 - University of Cambridge	Object	<p>Response to 6.2:</p> <p>The Sustainability Appraisal does not reflect the true nature of the development, as a percentage of the residential development will be for key workers, and the remainder will be private market housing. As such, the evaluation that 'Housing is for university staff' is inaccurate and results in an incorrect assessment of PPO NW7 under SA objective 6.2.</p>	<p>Agree that the comment made in the Sustainability Appraisal is unclear and should have been expanded on to provide further explanation. The results of the appraisal are meant to indicate that in the absence of data regarding which staff constitute the University's definition of Key Worker, it is difficult to make an assessment of the impacts of the policy. In the majority of development, affordable housing would be a mix of social rented and intermediate tenures, which, one could argue, would attract a greater range of residents from different social backgrounds than focussing on just key worker housing. The appraisal does not dispute the University's need for this level of key worker housing however.</p>
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Representations**Nature Representation Summary****Councils Response***Matrix Table - Preferred Option Policy NW8*

3349 - University of Cambridge	Object	Response to 7.1: The University will be providing development space for a range of employment uses across the site, including both academic and commercial research space.	Concern noted. The appraisal reflects the predominance of University related uses on the site as highlighted in the policy, and employment uses that can demonstrate a need to be close to the University, although it does not necessarily see this as a negative as it recognises the local, regional and national economic benefits of such sectors.
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Matrix Table - Preferred Option Policy NW10

3489 - University of Cambridge	Object	Response to 7.1, 7.2, 7.3: The University will be providing both research and commercial units on the site widening the field of employment use. The continued development of University facilities and the higher provision in the amount of space, as part of the "learning economy," will only strengthen and enhance the image of Cambridge (locally and globally). The mix of employment uses put forward in the AAP PPO NW10 is arbitrary and pro-rated from the Cambridge City Local Plan; therefore the mix is not reflective of the true diversity of employment uses that could be provided on site.	Concern noted. However this objection would be more suitably directed to the policy contained within the Area Action Plan itself rather than the Sustainability Appraisal.
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Matrix Table - Preferred Option Policy NW11

3350 - University of Cambridge	Object	Response to 2.3: The masterplan will be retaining an existing public rights of way passage situated at the west of the site.	Concern noted. The Sustainability appraisal is an appraisal of the policies contained in the Area Action Plan, not the masterplan. The emphasis of the appraisal is on the temporary loss of rights of way during the construction period (i.e. the short term), although it recognises that these will be reinstated after the construction period (medium to long-term).
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Matrix Table - Preferred Option Policy NW14

3351 - University of Cambridge	Object	Response to 3.3: The assessment of potential rat-running impacts on neighbouring residents is entirely speculative and not founded in technical work. Satisfaction of neighbouring residents is likely to be improved with the establishment of a reliable and efficient priority public transport network along this route.	Concern noted. It is the role of the appraisal to highlight potential impacts of development at North West Cambridge. The assumption made in the appraisal reflects the fact that the impact on the Sustainability Appraisal Objective is dependent on implementation, but if there were to be an impact it would most likely be negative. In the section of the appraisal concerned with mitigation measures and recommendations, the appraisal acknowledges that discussions with the Councils have indicated that strategic measures will be used to minimise trips that could be considered to be "rat-running" and that the wider transport planning context can therefore be used as a form of mitigation.
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<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Councils Response</i>
<i>Matrix Table - Preferred Option Policy NW19</i>			
3352 - University of Cambridge	Object	<p>Response to mitigation/recommendations:</p> <p>The University supports the principle of private vehicle traffic and promotion of other types of more sustainable forms of transport. However, the scale and frequency of public transport throughout the site will not be significant enough to justify a fully car-free development. In higher density parts of the site, particularly in areas with a high proportion of flats, nearer to community facilities and nearer to the existing city of Cambridge, the University will be exploring opportunities to reduce parking provision well below the maximum standards set out in the AAP.</p>	<p>Concern noted. The recommendation in the Sustainability Appraisal is aspirational and the Councils recognise that it would be difficult to implement a car free development at this site. The Councils are, however, seeking a modal split of no more than 40% of trips by car, and this work is supported by transport modelling.</p>
<i>Matrix Table - Preferred Option Policy NW23</i>			
3353 - University of Cambridge	Object	<p>Response to 3.3:</p> <p>Policy PPO NW23 sets out quantitative requirements for open space provision on site. It does not provide guidance as to the quality or function of the open space or recreation provision. It is unclear how the Sustainability Appraisal was able to assess the qualitative impact of open space provision.</p>	<p>Concern noted. Section 3.11 of the Appraisal acknowledges that due to the strategic nature of the Area Action Plan, much of the data needed to make precise assessments will not be available until the masterplanning and planning application stage. As such, a number of assumptions have been made regarding the policies. However, it is a well established fact that provision of open space has positive impacts on peoples health and wellbeing and on the perception of the public realm.</p>
<i>Matrix Table - Preferred Option Policy NW24</i>			
3354 - University of Cambridge	Object	<p>Response to 1.2:</p> <p>The University supports reducing the overall impact of the scheme, however, there is no clear justification for why this particular scheme should be made 'carbon neutral' at this point in time. In addition, the SA provides no explanation as to how the University could achieve this aim in the context of the overall scheme.</p>	<p>Concern noted. The appraisal's recommendation for the development to be carbon neutral is an aspirational one and it is not intended that sustainability appraisals should provide advice on the technical designs of sites. The Councils recognise that it would be difficult to implement zero carbon development from the outset, although the policy does seek to bring development closer to zero carbon (i.e. Code for Sustainable Homes Level 6) gradually over time.</p>
<i>Matrix Table - Preferred Options Policy NW26</i>			
3355 - University of Cambridge	Object	<p>Response to 3.2:</p> <p>The University's masterplan will include SUDs and ecological areas as part of the strategic gap along with recreational uses, ensuring retention and enhancement of biodiversity and wetland species, resulting in a multi-functional and active interest space.</p>	<p>Concern noted, however the Sustainability Appraisal is an appraisal of the Area Action Plan policies, not the masterplan. The Councils welcome the University's approach to providing SUDs and ecological areas as part of the masterplan for North West Cambridge.</p>

Representations**Nature Representation Summary****Councils Response****Matrix Table - Preferred Options Policy NW28**

3356 - University of Cambridge	Object	Response to 2.3: The University's masterplan ensures that Washpit Brook is retained in good ecological condition and enhanced, but will also ensure a balancing pond is provided as part of SUDs that will also be a key feature of interest for the community.	It is the role of the Sustainability Appraisal to appraise the Area Action Plan policies or alternatives, not the masterplan. The Councils welcome the University's intention to ensure that the Washpit Brook is retained and enhanced. This will have a positive impact on people's ability to access and appreciate wildlife and wild places, as acknowledged by the Sustainability Appraisal.
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Matrix Table - Preferred Options Policy NW31

3357 - University of Cambridge	Object	Response to 2.3: The University's masterplan will include a strategic landscaping strategy, including phasing of landscaping elements alongside different phases of development. This will include treatment of existing hedgerows and enhancement of wildlife habitats.	It is the role of the Sustainability Appraisal to appraise the Area Action Plan policies or alternatives, not the masterplan. The Councils welcome the University's intention to prepare a strategic landscaping strategy as part of the masterplan for North West Cambridge. This will have positive impacts on people's ability to access and appreciate wildlife and wild places, as acknowledged by the Sustainability Appraisal.
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Matrix Table - Preferred Options Policy NW33

3358 - University of Cambridge	Object	Response to 2.3: The University's masterplan will include a strategic landscaping strategy, including phasing of landscaping elements alongside different phases of development. This will include treatment of existing hedgerows and enhancement of wildlife habitats.	It is the role of the Sustainability Appraisal to appraise the Area Action Plans policies or alternatives, not the masterplan. The Councils welcome the University's intention to prepare a strategic landscaping strategy as part of the masterplan for North West Cambridge. This will have positive impacts on people's ability to access and appreciate wildlife and wild places, as acknowledged by the Sustainability Appraisal.
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