



Appendix I

South Cambridgeshire Local Development Framework

Sustainability Appraisal Scoping Report & Draft Final Sustainability Reports for the Core Strategy DPD, Development Control Policies DPD and Site Specific Policies DPD

Responses to Representations

Special Council 15 November 2005

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Councils' Assessment</i>	<i>Change to Draft DPD</i>
12. Healthy Communities				
3				
8963 - South Cambridgeshire Primary Care Trust	Object	Whilst the assessment recognises the needs of the increasing population over retirement age, it does not identify that high quality family and early years support is a key issue in developing healthy and inclusive communities.	Noted.	Add to table Key Sustainability Issues: Inclusive Communities: Issue: Ensuring high quality family and early years support is available.
13. Inclusive Communities				
13.7				
9137 - Addenbrooke's Hospital	Support	The Trust welcomes the comments contained in the Inclusive Communities section of this report. Section 13.7 of the report highlights the difficulties being experienced by key workers and key worker employers. The experiences outlined in this section of the report are echoed in the problems that the Cambridge University Hospitals Foundation Trust experiences in recruiting and retaining members of staff - many of whom are poorly paid on nationally negotiated rates of pay. Many of these staff experience difficulties in securing appropriate housing units either to rent or buy.	support noted.	
2				
8973 - South Cambridgeshire Primary Care Trust	Object	Whilst the assessment recognises the need for facilities for young people , it does not identify that high quality family and early years support is a key issue in developing healthy and inclusive communities.	Agree.	Add to table Key Sustainability Issues and Responses: Inclusive Communities: The importance of high quality family and early years support.
1. Relevant plans/programmes reviewed				
2. National				
8975 - South Cambridgeshire Primary Care Trust	Object	Under National please add:'Choosing Health: making healthier choices easier' White Paper (DoH November 2004). Replaces ' Our Healthier Nation'. 'Delivering Choosing health: making healthier choices easier'Guidance (DoH) published in March 2005. Wanless D et al (2004) 'Securing Good Health for the Whole Population: Final report. HM Treasury	Agree, review additional documents and add to list.	Add:'Choosing Health: making healthier choices easier' White Paper (DoH November 2004). Replaces ' Our Healthier Nation'. 'Delivering Choosing health: making healthier choices easier'Guidance (DoH) published in March 2005. Wanless D et al (2004) 'Securing Good Health for the Whole Population: Final report. HM Treasury

Representations***Nature Representation Summary******Councils' Assessment******Change to Draft DPD******4. List of appraisal questions******Healthy communities***

9027 - South Cambridgeshire
Primary Care Trust

Object

The PCT has a number of questions that it feels should be included in the list of appraisal questions. These questions relate specifically to the PSA targets set in 'Choosing Health'. The questions are detailed fully in our response.

Whilst some changes are agreed, other suggested criteria are considered too detailed, and not directly relevant to the appraisal of plan policies. The broader question on healthy lifestyles will cover most of these issues, and highly specific proposals can consider any specific issues under that question.

Amend the following criteria under 5.1: Change 'Will it reduce death rates' to 'Will it substantially reduce mortality rates?'

Amend Objective 6.2 to include consideration of health inequalities.

Representations

Nature Representation Summary

Councils' Assessment

Change to Draft DPD

5. Analysis of external requirements

Healthy communities

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Councils' Assessment</i>	<i>Change to Draft DPD</i>
8994 - South Cambridgeshire Primary Care Trust	Object	The PCT has a number of appraisal objectives and specific requirements that it feels should be included in this column. These are taken from the Government White paper, Choosing Health: Making healthier choices easier and the guidance document Delivering Choosing Health	Agree to add more detail on health targets.	<p>Replace various targets to reduce death rates to; Objective to improve the health of the population, underpinned by the following specific targets:</p> <p>1. Substantially reduce mortality rates by 2010</p> <p>-From heart disease and stroke and related disease by at least 40% reduction in the inequalities gap between the fifth of areas with the worst health and deprivation and the population as a whole (data source ONS mortality statistics);</p> <p>-From cancer by at least 20% in people under 75, with a reduction in the inequalities gap of at least 6% between the fifth of areas with the worst health and deprivation indicators and the population as a whole (data source ONS mortality statistics);</p> <p>-From suicide and undetermined injury by at least 20%</p> <p>2. Reduce health inequalities by 10% by 2010 as measured by infant mortality and life expectancy at birth: Starting with children under one year, by 2010 to reduce by at least 10% the gap in mortality between 'routine and manual' groups and the population as a whole (data source ONS mortality statistics);</p> <p>Starting with local authorities, by 2010 to reduce by at least 10% the gap between the fifth of areas with the 'worst health and deprivation indicators' and the population as a whole (data source: ONS data)</p> <p>3. Tackle the underlying determinants of ill health and health inequalities by:</p> <p>-Reducing adult smoking rates to 21% or less by 2010, with a reduction in prevalence among routine manual groups to 26% or less.</p>

Sustainability Appraisal Scoping Report: South Cambridgeshire

Public Participation Report

4. Review of documents and objectives

4.1

Representations

Nature Representation Summary

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Change to Draft DPD

4. Review of documents and objectives

4.1

8955 - South Cambridgeshire Primary Care Trust	Object	Following the Consultation stage, the Council agreed that the review of relevant plans and strategies would be updated to provide more detailed review of health issues. It also agreed to develop additional decision making criteria where appropriate. Two key local documents have been added to the list of documents although no changes to objectives or criteria have been made or discussed with the PCT. We feel that the objectives, criteria and indicators of the Government's Public Health White Paper, Choosing Health, should be incorporated into the Sustainability Appraisal Scoping Report. This will fulfil the Council's earlier commitment.	It is agreed that the additional document should be reviewed. Many considerations detailed in 'Our Heathier Nation', are not directly related to issues covered by the local development framework. Where it is considered there are relevant issues they have been included.	Review and add to the documents list: 'Delivering Choosing health', published in March 2005.
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4.10

9336 - Gallagher Longstanton Limited	Object	This is a comment not an objection. It is the case that some of the documents reviewed will make reference to the need to take account of feasibility issues, technical and commercial. In commenting on the Draft Appraisals the question is asked as to how such feasibility and implementation issues have been or can be taken into account in the appraisal process.	The sustainability appraisal process must highlight the impact of policies and proposals. It is acknowledged that practical issues exist relating to implementation.	
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Table 1

9813 - Haslingfield Parish Council	Object	No reference to Barrington Works which would have thought would have been essential, unless the thinking is that this will be covered by other processes such as planning inquiries. Development of this works will have high impact on many areas of this report.	The Barrington Works site is too specific to examine through the scoping report, which examines the broad issues impacting on the District, and creates a framework for considering the impact of proposals. If any proposals in the LDF relate to it, they would be examined through the sustainability appraisal of the policy, examining directly the impact of any development.	
9812 - Haslingfield Parish Council	Support	Overall this was a good outline of the issues to be addressed in the sustainability appraisal. It covered: land and water, biodiversity, landscape, climate, healthy communities, inclusive communities and economic activity. Clearly an outline only but thought covered all the key issues that would be relevant to Haslingfield.	Support noted.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Councils' Assessment</i>	<i>Change to Draft DPD</i>
				-Halting the year-on-year rise in obesity among children under 11 by 2010 in the context of a broader strategy to tackle obesity in the population as a whole; -Reducing the under-18 conception rate by 50% by 2010 as part of a broader strategy to improve sexual health
<i>Inclusive communities</i>				
9041 - South Cambridgeshire Primary Care Trust	Object	The PCT has a number of appraisal objectives and specific requirements that it feels should be included in this column. These are taken from the Government White paper, Choosing Health: Making healthier choices easier and the guidance document Delivering Choosing Health. Against 6.3, specific requirements add: Improve the quality of life and independence of vulnerable older people by supporting them to live in their own homes.	Agree to add more detail to the requirements of other plans.	Against 6.3, specific requirements add: Improve the quality of life and independence of vulnerable older people by supporting them to live in their own homes where possible by - Increasing the proportion of older people being supported to live in their own homes by 1 % annually in 2007 and 2008 and; - Increasing by 2008, the proportion of those supported intensively to live at home to 34% of the total of those being supported at home or in residential care

Representation report to Draft Final
Sustainability Appraisal of Core Strategy,
Development Control Policies & Site
Specific Policies

Public Participation Report

1. SUMMARY AND OUTCOMES

Initial Sustainability Appraisal: Assessing the Options

Representations

Nature Representation Summary

Councils' Assessment

Change to Draft DPD

1. SUMMARY AND OUTCOMES

Initial Sustainability Appraisal: Assessing the Options

10754 - Countryside Properties
(Special Projects) Plc

Object

These objections relate to the methodology used to undertake the Sustainability Appraisal, and particularly in relation to the lack of proper testing of alternative options as required under the SA/SEA process. Particular references in the main report are:

(1) Page 4 (Assessing the Options);

These objections are essentially that the Sustainability Appraisal process is critically flawed as a result of its failure to assess alternative options for development.

Sustainability appraisals are required to assess reasonable alternatives. Reasonable alternatives can be restricted by higher level plans and strategies. In this case the South Cambridgeshire LDF has been given a very clear direction by the Cambridgeshire Structure Plan, and the Regional Spatial Strategy. This highly locationally specific strategy greatly limits reasonable alternative options.

Assessing site-specific proposals for housing

10755 - Countryside Properties
(Special Projects) Plc

Object

These objections relate to the methodology used to undertake the Sustainability Appraisal, and particularly in relation to the lack of proper testing of alternative options as required under the SA/SEA process. Particular references in the main report are:

(2) Page 6 (Assessing site specific proposals for housing);

These objections are essentially that the Sustainability Appraisal process is critically flawed as a result of its failure to assess alternative options for development.

Sustainability appraisals are required to assess reasonable alternatives. Reasonable alternatives can be restricted by higher level plans and strategies. In this case the South Cambridgeshire LDF has been given a very clear direction by the Cambridgeshire Structure Plan, and the Regional Spatial Strategy. This highly locationally specific strategy greatly limits reasonable alternative options.

3. APPRAISAL METHODOLOGY

Section Text

9285 - Gallagher Longstanton
Limited

Object

Reference is made to the consequential demands placed on developments by particular policy elements. However there does not seem to be structured means by which the feasibility or deliverability of policies or policy options is assessed within the appraisal process.

Although delivery is addressed by the AAP itself, it is not the role of SA / SEA to determine how the necessary infrastructure is funded or what specifically is delivered through S.46/S.106 agreements.

9272 - Gallagher Longstanton
Limited

Support

The appraisal methodology follows the draft guidance and rightly recognises the difficulties of absolute assessments.

Support noted.

Representations**Nature Representation Summary****Councils' Assessment****Change to Draft DPD****4. SUSTAINABILITY OBJECTIVES, BASELINE & CONTEXT***Land and water resources*

10302 - Huntsman Advanced Materials	Object	Paragraph 4.4 states that the 'limited stock of brownfield land means new development will inevitably result in the loss of high quality agricultural land'. In our view, this suggests that there may be a shortfall in meeting the 37% policy requirement given the limited stock of brownfield land. Even if the 37% target is achieved, there would still be a substantial shortfall in achieving the Government's target of 60%. For both of these reasons we consider that the Council should be looking to maximise all opportunities to bring forward previously development brownfield sites for development.	The brownfield land target is addressed by the DPD, and implementation will be monitored to ensure targets are being met. No change to the Sustainability Appraisal is sought by this representation.
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Economic activity

10303 - Huntsman Advanced Materials	Object	We note that Paragraph 5.4 of the Draft Final Sustainability Report Core Strategy, Development Control Policies, Site Specific Policies refers to 'all' criteria rather than 'one' criterion. We consider that this Paragraph needs to be amended to reflect the amended Policy ET/7.	ET/7 has been proposed to be modified. The impact of those changes will be reassessed for the sustainability appraisal of the submission DPD.	Reappraise policy in light of changes proposed to the DPD.
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Table 6: Sustainability Appraisal Framework (Source: South Cambridgeshire District Council, 2004, revised 2005).

9795 - Haslingfield Parish Council	Object	Very wordy and complex, difficult to know what they are getting at. Woolly aims, some of which are outside the control of SCDC, so how are they going to achieve them, eg improving health facilities is a stated aim but this is under the control of the primary health trusts. Bearing in mind the close links and strong integration between Cambridge City and its surrounding area, has this report been drawn up in co-ordination with Cambridge City Council?	It is acknowledged that sustainability appraisal is a complex process. Objectives have been reviewed in conjunction with Cambridge City Council to ensure a degree of consistency where appropriate. Not all the objectives are directly addressed by policies in the LDF, however the impact of planning policies on those objectives is assessed.
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Representations***Nature Representation Summary******Councils' Assessment******Change to Draft DPD******5. PLAN ISSUES AND OPTIONS******Section Text***

10756 - Countryside Properties
(Special Projects) Plc

Object

These objections relate to the methodology used to undertake the Sustainability Appraisal, and particularly in relation to the lack of proper testing of alternative options as required under the SA/SEA process. Particular references in the main report are:

(3) Page 33 (Main strategic options);

These objections are essentially that the Sustainability Appraisal process is critically flawed as a result of its failure to assess alternative options for development.

Sustainability appraisals are required to assess reasonable alternatives. Reasonable alternatives can be restricted by higher level plans and strategies. In this case the South Cambridgeshire LDF has been given a very clear direction by the Cambridgeshire Structure Plan, and the Regional Spatial Strategy. This highly locationally specific strategy greatly limits reasonable alternative options.

Representations**Nature Representation Summary****Councils' Assessment****Change to Draft DPD****APPENDIX 2: ASSESSMENT OF POLICY ALTERNATIVES****ST/2 RE-USING PREVIOUSLY DEVELOPED LAND AND BUILDINGS**

10757 - Countryside Properties
(Special Projects) Plc

Object These objections relate to the methodology used to undertake the Sustainability Appraisal, and particularly in relation to the lack of proper testing of alternative options as required under the SA/SEA process. Particular references in the main report are:

(4) Page 5/Policy ST2 of Appendix 2 (PDL target);

These objections are essentially that the Sustainability Appraisal process is critically flawed as a result of its failure to assess alternative options for development.

The previously developed land target is detailed in policy P5/2 of the Cambridgeshire Structure Plan. As such it has already been subject to appraisal.

ST/3 RURAL CENTRES

10759 - Countryside Properties
(Special Projects) Plc

Object These objections relate to the methodology used to undertake the Sustainability Appraisal, and particularly in relation to the lack of proper testing of alternative options as required under the SA/SEA process. Particular references in the main report are:

(6) Pages 6-11 (Rural Settlement Strategy) of Appendix 2;

These objections are essentially that the Sustainability Appraisal process is critically flawed as a result of its failure to assess alternative options for development.

The criteria for selection of rural centres were detailed in the Cambridgeshire Structure Plan 2003. A Rural Centres Preferred Options Document explored their selection against these criteria. Reasonable options are therefore limited. The policies for other settlements limit development to smaller scales, taking account of services and facilities available in the villages. It is not considered reasonable to rule out development completely in smaller villages. Minor variations in scales of development permitted in smaller villages would have a limited impact on their appraisal outcome. This strategy has been subject to participation at the Statutory bodies consultation, and preferred options public participation prior to this stage.

DEVELOPMENT WITHIN RURAL CENTRES (paragraphs 2.30-2.31)

10760 - Countryside Properties
(Special Projects) Plc

Object These objections relate to the methodology used to undertake the Sustainability Appraisal, and particularly in relation to the lack of proper testing of alternative options as required under the SA/SEA process. Particular references in the main report are:

(6) Pages 6-11 (Rural Settlement Strategy) of Appendix 2;

These objections are essentially that the Sustainability Appraisal process is critically flawed as a result of its failure to assess alternative options for development.

The criteria for selection of rural centres were detailed in the Cambridgeshire Structure Plan 2003. A Rural Centres Preferred Options Document explored their selection against these criteria. Reasonable options are therefore limited. The policies for other settlements limit development to smaller scales, taking account of services and facilities available in the villages. It is not considered reasonable to rule out development completely in smaller villages. Minor variations in scales of development permitted in smaller villages would have a limited impact on their appraisal outcome. This strategy has been subject to participation at the Statutory bodies consultation, and preferred options public participation prior to this stage.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Councils' Assessment</i>	<i>Change to Draft DPD</i>
<i>PERIPHERAL DEVELOPMENT AT RURAL CENTRES (paragraphs 2.30-2.31)</i>				
10761 - Countryside Properties (Special Projects) Plc 10758 - Countryside Properties (Special Projects) Plc	Object	These objections relate to the methodology used to undertake the Sustainability Appraisal, and particularly in relation to the lack of proper testing of alternative options as required under the SA/SEA process. Particular references in the main report are: (5) Page 8 (Peripheral development at rural centres) of Appendix 2; These objections are essentially that the Sustainability Appraisal process is critically flawed as a result of its failure to assess alternative options for development.	The number of reasonable alternative approaches is restricted by the RSS and the Structure Plan. This limits the amount of development required in the rural area. Existing commitments and completions make up a significant amount of the requirement. The urban capacity study indicates windfalls likely in the remaining plan period. The operation of the LDF density policies in the remaining area of Cambourne, also tested elsewhere in the plan, but limited by structure plan and national policies, provides additional land supply. Additional allocations on the edges of frameworks are not required to meet land supply requirements, therefore alternative approaches of allocating additional land are not reasonable.	
<i>ST/5 GROUP VILLAGES</i>				
10762 - Countryside Properties (Special Projects) Plc	Object	These objections relate to the methodology used to undertake the Sustainability Appraisal, and particularly in relation to the lack of proper testing of alternative options as required under the SA/SEA process. Particular references in the main report are: (6) Pages 6-11 (Rural Settlement Strategy) of Appendix 2; These objections are essentially that the Sustainability Appraisal process is critically flawed as a result of its failure to assess alternative options for development.	The criteria for selection of rural centres were detailed in the Cambridgeshire Structure Plan 2003. A Rural Centres Preferred Options Document explored their selection against these criteria. Reasonable options are therefore limited. The policies for other settlements limit development to smaller scales, taking account of services and facilities available in the villages. It is not considered reasonable to rule out development completely in smaller villages. Minor variations in scales of development permitted in smaller villages would have a limited impact on their appraisal outcome. This strategy has been subject to participation at the Statutory bodies consultation, and preferred options public participation prior to this stage.	
<i>ST/5 INFILL VILLAGES</i>				
10763 - Countryside Properties (Special Projects) Plc	Object	These objections relate to the methodology used to undertake the Sustainability Appraisal, and particularly in relation to the lack of proper testing of alternative options as required under the SA/SEA process. Particular references in the main report are: (6) Pages 6-11 (Rural Settlement Strategy) of Appendix 2; These objections are essentially that the Sustainability Appraisal process is critically flawed as a result of its failure to assess alternative options for development.	The criteria for selection of rural centres were detailed in the Cambridgeshire Structure Plan 2003. A Rural Centres Preferred Options Document explored their selection against these criteria. Reasonable options are therefore limited. The policies for other settlements limit development to smaller scales, taking account of services and facilities available in the villages. It is not considered reasonable to rule out development completely in smaller villages. Minor variations in scales of development permitted in smaller villages would have a limited impact on their appraisal outcome. This strategy has been subject to participation at the Statutory bodies consultation, and preferred options public participation prior to this stage.	

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Councils' Assessment</i>	<i>Change to Draft DPD</i>
<i>SP/1 HOUSING ALLOCATIONS IN RURAL AREAS</i>				
10764 - Countryside Properties (Special Projects) Plc	Object	<p>These objections relate to the methodology used to undertake the Sustainability Appraisal, and particularly in relation to the lack of proper testing of alternative options as required under the SA/SEA process. Particular references in the main report are:</p> <p>(7) Pages 60-73 (SP1 Allocations) of Appendix 2.</p> <p>These objections are essentially that the Sustainability Appraisal process is critically flawed as a result of its failure to assess alternative options for development.</p>	<p>The majority of sites in Policy SP/1 have planning permission and are proposed to be removed as 'proposals' from the Site Specific Policies. These sites cannot therefore be substituted for development in Cambourne or anywhere else. Those sites are counted as commitments and are included in Figure 3 of the Core Strategy which shows the Housing Land Supply in Rural Areas - a 10% discount is applied to all planning permissions in Figure 3 to allow for a proportion of planning permissions which may not be implemented. The remaining allocations in policy SP/1 are at Impington, Waterbeach, Papworth Everard and Heathfield. (NB. The allocations at Papworth Everard and Heathfield also have planning permission which was granted after March 2005 - the operative date for the most recent housing land supply figures). Both Impington and Waterbeach are progressing towards development under Local Plan 2004.</p>	

Representations**Nature Representation Summary****Councils' Assessment****Change to Draft DPD****ANNEX - DETAILED POLICY ASSESSMENTS***ST/1 □ Housing provision*

9294 - Gallagher Longstanton Limited

Object

This is not an objection. Whilst we do not necessarily agree with all of the judgements made in the detailed policy assessment we have not sought to comment generally on the detailed assessments. It is recognised that the process involves subjectivity and that constraints are placed on the assessment by the absolute basis for judgement.

Noted. It is acknowledged that some considerations are necessarily subjective. However, the commentary does provides information on the basis for decisions, to ensure the process is transparent.

9305 - Gallagher Longstanton Limited

Object

One assessment which is of concern is the assessments made in relation to the percentage of affordable housing (and of 1 and 2 bed houses) on the objective to create places that work well and the failure to identify negative impacts

This objective is addressing the impact on townscape. There is no reason why a higher or lower percentage of affordable housing would have a negative impact on the townscape.

ET/7 □ Loss of rural employment to non-employment uses

10318 - Huntsman Advanced Materials

Object

We note that Paragraph 5.4 of the Draft Final Sustainability Report Core Strategy, Development Control Policies, Site Specific Policies refers to 'all' criteria rather than 'one' criterion. We consider that this Paragraph needs to be amended to reflect the amended Policy ET/7.

Policy ET/7 is proposed to be modified. The impact of those changes will require a reappraisal of this policy.

Reappraise policy ET/7.

SP/18 □ Cambourne

9407 - The Cambourne Consortium

Object

The Sustainability Appraisal should be broadened to identify wider range of sustainability objections thereby enabling a proper consideration of the merits in enlarging Cambourne beyond the confines of the Master Plan against other alternative South Options.

The Sustainability Appraisal Scoping Report has been subject to initial consultation with statutory bodies, and wider public participation at the preferred options stage. It is considered to have developed an effective set of sustainability objectives capable of testing policies and proposals against. Sustainability appraisal is only required to test reasonable alternatives, this includes consideration of the policy framework set out by higher plans and strategies. The sustainability appraisal tested alternatives available within the strategy of the RSS and the structure plan.