



## **SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL**

### **Sustainability Appraisal / Strategic Environmental Assessment of the draft Development Plan Document on Core Strategy & Development Control Policies**

#### **INTERIM REVIEW DRAFT**

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**Prepared For:**

South Cambridgeshire District Council

**Prepared By:**

Scott Wilson Kirkpatrick & Co Ltd  
Scott House  
Basing View  
Basingstoke  
Hampshire  
RG21 4JG

## CONTENTS

1	The context of this report .....	1
2	Overview of the process .....	1
3	Overview of the assessment.....	3
4	Summary of detailed policy assessments .....	4
4.1	Strategy policies .....	5
4.2	Green Belt policies .....	8
4.3	Development principles policies .....	11
4.4	Housing policies .....	14
4.5	Site-specific allocations policies .....	17
4.6	Economy & tourism policies .....	31
4.7	Services & facilities policies .....	36
4.8	Natural environment policies .....	41
4.9	Cultural heritage policies .....	50
4.10	Travel policies .....	53
5	Summary of cumulative impact assessment.....	57

Detailed assessments of all policies summarised in Section 4, and matrices used in the cumulative impact assessment summarised in Section 5, are also available in separate annexes.

## **1 THE CONTEXT OF THIS REPORT**

This document is an Interim Review Draft of the detailed assessment of the South Cambridgeshire Core Strategy and Development Control Policies Development Control Document (DPD). Sustainability Appraisal and Strategic Environmental Assessment (SA / SEA) of plan documents is required under the provisions of the Planning and Compulsory Purchase Act and the corresponding Town and Country Planning Regulations (England) of 2004; the EU Directive on SEA and the corresponding UK regulations.

It has been possible to complete only part of this stage of the assessment process due to the limited time available between completion of the draft policies and their submission for an initial inspection by Members. Following agreement with the Council's planning staff, Scott Wilson has prepared this Interim Review Draft in order that Members can use the assessment summaries completed to date to inform their review of the draft DPD policies.

Members are advised that:

- This interim Report is not intended to conform to the requirements for the draft Final Environmental Report as required for SA/SEA, although it contains much of its content. A compliant Report will be produced once assessment is complete.
- Further assessment of detailed, potentially significant impacts may be necessary to supplement and extend the analysis summarised in this report. Discussions with the Council as to the extent of such analysis, and the source of supporting data, are continuing.

## **2 OVERVIEW OF THE PROCESS**

The assessment follows an earlier, initial appraisal which was applied to Preferred Options Reports produced by the Council in June and July 2004, and which were reviewed by Members and then submitted for public consultation in the subsequent months.

Analysis of the assessments, consultation responses and members' comments has led to the selection of some policies where alternative options were presented previously. Feedback and representations about specific development sites have also been taken into account in revising and refining the draft policies, and some new policies have been introduced. Feedback has also resulted in some minor changes to the objectives that provide the structure of the SA/SEA appraisal.

In the light of these changes it has been necessary to re-assess all the policies presented in the initial draft of the DPD using the revised assessment framework and objectives.

On completion of this stage it has been necessary to evaluate and summarise also the apparent synergistic, cumulative and secondary impacts of the policies in order that there is a clearer appreciation of the broader impact of the DPD as a whole.

As indicated above, further analysis may be needed to establish the significance of certain impacts and to determine whether more detailed site assessment is warranted at this stage. This last stage must take account of the intended links between SA/SEA and Environmental Impact Assessment (EIA) of development projects, and must strike a balance between the need to define significant impacts with an appropriate level of detail, against the need to avoid exhaustive site investigation that would duplicate work normally undertaken as part of an EIA once development of a particular site is taken forward.

To summarise, the objectives of this stage of assessment are to:

- Predict the nature of the impacts of the plan policies (do they support or conflict with the sustainability objectives?).
- Assess the significance of these impacts qualitatively, by professional judgement or precedent, or quantitatively, informed by benchmarks, standards and thresholds that provide a basis for absolute comparison.
- Review broader groups of policies to assess their cumulative and synergistic effects. Typically these will have negative and positive impacts respectively in most cases.
- Propose (initial) appropriate mitigation measures for dealing with these impacts. Mitigation can include changes to policy wording or physical measures.

Section 4 of this report contains summary sections from the assessment of virtually all the draft policies in the initial draft of the DPD<sup>1</sup>. These sections contain a précis of the policy and summary of the main conclusions of the assessment. Comments on appropriate mitigation measures are included where necessary, and in some cases a short statement about apparent cumulative, synergistic effects is provided to inform the summary and raise additional issues for consideration of the individual policy's impact.

Section 5 of this report contains a separate set of summaries which present the results of a broader consideration of cumulative and other effects from each set of policies (eg. Development Policies, Housing Policies).

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<sup>1</sup> At present a number of rural sites for residential development have yet to be assessed. However these are all less than 2 hectares in size which are expected to result in negligible local impacts.

### **3 OVERVIEW OF THE ASSESSMENT**

Our overall assessment is that the policies in this DPD are for the most part benign - that is they individually support the sustainability objectives of the Local Development Framework. This is evident in some of the attached assessment summaries which show there is little to comment on certain policies. Inevitably some have impacts that conflict with individual sustainability objectives, but these are relatively few. At this stage we have not identified any that can be regarded as significant, but this should not be regarded as a definitive conclusion.

Many of these policies are preventative, insofar as they aim to deter inappropriate development. Many are also curative in that they implement overarching measures designed to correct the Key Issues identified earlier in the assessment process. Policy HG/3 on affordable housing is a specific and important example.

Many policies are also prescriptive and general. Their broad impact on land use change can be identified, in terms of where development can or cannot occur. However in most cases the overall impact is difficult to calibrate without more information about the scale and timing of development. In some cases this cannot be assessed until a master plan or development proposal for a particular site has been prepared. Nevertheless, further consideration will be given to this issue in the rest of the assessment.

However the DPD contains a section on Site Specific Allocations where the scale of development (and its timing in some instances) is more definite. This report contains an initial assessment of the nature and likely significance of these developments, but further consideration will be given to the need to assess the local impacts more precisely.

Finally it is essential to reiterate an important principle underlying the assessment. The DPD facilitates development in an area of known water shortages, containing large tracts of high quality agricultural land, where brownfield land for redevelopment is in limited supply, but which is confronted with significant development pressure as a result of the growth of Cambridge as a regional centre.

Development in this area, whether on greenfield or brownfield land, cannot be regarded as sustainable in absolute terms if it exacerbates known problems. However, the assessment acknowledges that development is necessary to support growth of the sub-regional economy in a planned manner to maximise the sustainability of land use changes.

It also recognises that these developments are reflect government policy, particularly on housing growth, and take forward policies from the Cambridgeshire Structure Plan. Many of these are based on a sustainability appraisal which, though it was not based on the current

guidance, aimed to direct development to the most sustainable locations. In these circumstances the impact of development is therefore assessed in relative terms.

Differences between absolute and relative impacts are acknowledged in the detailed assessments and the supporting summaries where appropriate.

## **4 SUMMARY OF DETAILED POLICY ASSESSMENTS**

The detailed assessments currently comprise almost 270pp. of material. In order to provide Members with a summary of the assessment to inform their review of the emerging DPD, the following pages draw together the outline of each of the policies and the key conclusions and recommendations from this analysis.

These summaries are followed by a short section which summarises the cumulative impact assessment completed to date.

## 4.1 STRATEGY POLICIES

### ***ST/1 – Housing provision***

Provision will be made for 20,000 new homes in the period 1999-2016, including 4400 on the edge of Cambridge, 6000 at Northstowe, and 9600 in Rural Centres and other villages.

*Summary of assessment:* In absolute terms the proposed growth in housing is unsustainable as it will increase *resource consumption, increase waste, etc.*, although the selection of sites clearly limits the *loss of undeveloped land*. However, we understand that an SA of housing growth sites was undertaken as part of the Cambridgeshire Structure Plan process, and this established that the chosen locations are the most sustainable in other respects, given the imperative of expanding the housing stock. Moreover expansion of the housing stock will redress current imbalances between demand and supply, supporting expansion of the economies of the district and the wider sub-region. This policy therefore illustrates the trade-off that must be made between the absolute and relative aspects of sustainability.

*Summary of mitigation proposals:* Effective policies and criteria of all levels of design to minimise the impact on resource consumption are essential but are addressed elsewhere in the strategy.

*Secondary, cumulative or synergistic effects:* The principal secondary effect is likely to be the impact on development on this scale on resource supplies, especially water, if these are to be met from local sources. Development will concentrate additional traffic in areas that may already be subject to some intermittent congestion, but this impact needs to be balanced against the adverse effects of more dispersed development which would still add to traffic and emission levels.

### ***ST/2 – Reusing previously developed land and buildings***

Sets a target that 37% of new dwellings should be built on previously developed land in the period 1999 to 2016.

*Summary of assessment:* Policy clearly supports guidance on sustainable communities and the need to take available opportunities to integrate mixed land use and maximise efficient use of the land stock. The target is almost half the national target, though this is 'saved' from the Structure Plan and is understood to reflect the very limited stock of such land in the district at present.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* While the target reflects local brownfield land shortages, once combined with the house building targets imposed by government and Structure Plan targets, there is a clear and substantial absolute negative sustainability impact on demand for undeveloped land.

### **ST/3 – Rural Centres**

Identifies five of the districts larger settlements which already have established services and amenities and good sub-regional transport links, and which will be the focus of development in addition to Northstowe and urban infill / extension around Cambridge.

*Summary of assessment:* Policy is consistent with the underlying principles of PPS1, encouraging development to be focused on those centres which already have the greatest provision of services and amenities. This approach is consistent with other areas of policy, notably on sustainable transport, since it aims to create a critical mass of facilities in the most populous settlements, thereby bringing homes, work and services closer together for a sizeable proportion of the population.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* The principal secondary effect is likely to be the impact on development on this scale on resource supplies, especially water, if these are to be met from local sources. Development will concentrate additional traffic in areas that may already be subject to some intermittent congestion, but this impact needs to be balanced against the adverse effects of more dispersed development which would still add to traffic and emission levels.

### **ST/4 – Minor rural centres**

Defines the next tier in the settlement hierarchy and establishing a broad threshold for the scale of development that would be permitted in these locations. The policy states the intention to use Section 46 agreements for infrastructure provision as appropriate.

*Summary of assessment:* Limits the scale of new development in smaller centres which will still support a limited range of services and amenities, and which implicitly supports the broader settlement and retail hierarchies.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* In terms of natural resources attention is rightly focused on the impact of the major developments at Northstowe and Cambridge East. However these developments are necessitated by national housing policy and will make significant contributions to rebalancing housing stock with needs, even though the absolute impact on energy, water and other resources is apparent. Development in smaller centres, whether through infill or windfall, will contribute to housing targets, but only on an incremental scale, and the additional consumption of resources might be less easy to justify. It will be necessary to monitor the number of developments in these smaller settlements and to consider carefully their long-term cumulative impact on demand for natural resources locally.

### **ST/5 – Group villages**

Identifies a larger number of medium-sized villages where new residential developments of up to 8 dwellings would be permitted.

*Summary of assessment:* Another policy consistent with broad guidance on sustainable communities and with other plan policies on the settlement / retail hierarchies. One concern is that the limited scale of development may lie below the threshold for providing affordable housing and this may limit its availability in or next to the more rural areas of the district. .

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* As for ST/3.

### **ST/6 – Infill villages**

Identifies a large number of small settlements in which service / amenity provision is minimal and imposes constraints on the scale of new development (and presumably on re-development) that would be permitted.

*Summary of assessment:* Sustainable in that it prevents excessive and potentially intrusive development that would unbalance the layout of the smallest settlements. The policy effectively means that small settlements that are already under-served by services and amenities will stay that way, but this is consistent with the settlement and retail hierarchies that the ST/ policies are aiming to achieve.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### **ST/7 – Phasing of housing land**

Establishes role of Northstowe and other developments in delivering new housing in phases, but recognises the contribution of further development elsewhere on allocated land (and presumably through windfalls).

*Summary of assessment:* This is largely a procedural policy stating the Council's intention to manage the phased growth of housing, particularly in the large planned developments, while acknowledging its duty to maintain an adequate supply of land in other locations. Benefits are largely indirect and come from the phasing of housing with provision of other infrastructure to ensure there is a viable settlement from the outset, though clearly this applies primarily to Northstowe and Cambridge East.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***ST/8 – Plan, monitor, manage***

Establishes the Council's intention to monitor growth in new development, in particular to ensure housing targets and build on brownfield land, and identifies various forms of corrective action that may be used.

*Summary of assessment:* This policy is procedural, stating the Council's intention to monitor the progress of the LDF in key areas and take appropriate corrective action. It is clearly sustainable and consistent with the other areas of policy but cannot be reviewed in detail.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

## **4.2 GREEN BELT POLICIES**

### ***GB/1 – Green Belt boundaries***

The boundaries of the Green Belt are defined on the Proposals Map.

*Summary of assessment:* This is a procedural policy indicating where the extent of the Green Belt will be legally defined. Defining on the Proposals Map formally incorporates it into the LDF and district planning policy. As such the option cannot be assessed. Any impacts of the Green Belt are covered by the assessment of policy GB/2.

*Summary of mitigation proposals:* None – see below.

*Secondary, cumulative or synergistic effects:* The Council is assumed to have an underlying intention of preserving the Green Belt as far as possible. Developments such as Northstowe are mitigated by compensatory redesignation of land, but overall this represents a loss of the district's 'stock' of open land. Developments such as Northstowe are predicated on decisions taken high in the planning structure, but this raises the issue of whether this should result in more stringent controls on how much Green Belt land is removed and/or replaced as a result of other developments in order to limit the loss of open land in the longer term. (In practical terms this comment implies a concern that repeated redesignation of Green Belt land may weaken its role in managing development.)

### ***GB/2 – Development in the Green Belt***

Planning permission will only be granted within the Green Belt in very special circumstances (defined in 8 points). Inappropriate development will not be permitted and any form of development may require landscaping.

*Summary of assessment:* Overall the policy is clearly prevents *loss of agricultural land, maintains local character*, and provides the opportunity for *accessible open space* within easy reach of settlements.

*Summary of mitigation proposals:* Condition 2 of the policy permits appropriate development for recreational and leisure use. Should the policy or the supporting text indicate that ‘appropriate’ should be determined not only by maintaining the open character of the land but also that it should not result in excessive traffic since this indirectly affects the character and tranquillity of the area. This issue is partly addressed in GB/7 by encouraging non-car access, but traffic impacts are not mentioned specifically.

*Secondary, cumulative or synergistic effects:* None identified.

### ***GB/3 – Location and design of development***

Development considered appropriate must be located and designed so it has no adverse effect on the character and openness of the Green Belt.

*Summary of assessment:* Little to comment on; clearly supportive.

*Summary of mitigation proposals:* If the Council has prepared design guidelines should these be referenced in the supporting text? Equally, the text might make it clear if guidelines are to be covered in forthcoming guidance, possibly as an SPD.

*Secondary, cumulative or synergistic effects:* None identified.

### ***GB/4 – Landscaping & design measures***

Development on the edge of settlements must be carefully landscaped and designed to minimise the visual impact on the adjacent Green Belt.

*Summary of assessment:* As with GB/3, aims to minimise the impact on the *landscape character* of the Green Belt of any peripheral development that is considered appropriate.

*Summary of mitigation proposals:* As for GB/3.

*Secondary, cumulative or synergistic effects:* None identified.

### **GB/5 – Major developed sites**

Identifies four major sites and defines the nature of development that would be permitted within their boundaries.

*Summary of assessment:* A supportive policy necessitated by the presence of large campus sites with land potentially available for redevelopment, but lying within the open area of the Green Belt. The policy controls horizontal and vertical redevelopment.

*Summary of mitigation proposals:* It is not clear what redevelopment is envisaged, though the sites are a mixture of medical, research and manufacturing uses. In the light of Objectives 1.2 and 1.3 it could be made clearer that land use changes that result in significant changes in resource use, especially of water, would be resisted. However such provisions might be made in the Development Briefs mentioned in the supporting text.

*Secondary, cumulative or synergistic effects:* None as these are isolated sites.

### **GB/6 – Recreation in the Green Belt**

Encourages use of Green Belt land for recreation provided land use change is sympathetic and facilities are conveniently close to built-up areas and/or readily accessible by non-car modes of transport.

*Summary of assessment:* Supports objectives of *accessible open space* and *maintaining landscape character* by ensuring there is a range of countryside 'land uses' (ie. not just agricultural land) around settlements as they expand.

*Summary of mitigation proposals:* The policy and its supporting text does not refer to the nature of recreational developments, which appears potentially broad in type and impact. Country parks are mentioned and, implicitly, footpaths and bridleways. However other new development such as farmland turned over to golf courses, driving ranges and other non-agricultural uses are not mentioned specifically and the nature of these developments would need to be controlled carefully where they are acceptable.

*Secondary, cumulative or synergistic effects:* Synergistic impact of out-of-town recreational space combined with open space provision within settlements (the assessment assumes recreational features are not included in open space targets). There is also a longer-term synergistic effect of adopting a strategy for managing recreational facilities in the Green Belt – as proposed in the supporting text – if this supports provision and variety.

### **GB/7 – Improvements to landscape and biodiversity**

The Council aims to reverse declining habitat quality in the Green Belt through additional planting and habitat creation.

*Summary of assessment:* Clearly sustainable with a strong positive environmental focus that recognises countryside resources must need management to maintain quality.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified – policy is a reaction to secondary effects of agricultural practices.

### 4.3 DEVELOPMENT PRINCIPLES POLICIES

#### ***DP/1 – Infrastructure and new developments***

Coordinates the provision of a wide range of infrastructure in parallel with new development to ensure it is supported appropriately, and establishing the intention to seek developer contributions.

*Summary of assessment:* An essential policy given the nature and scope of development that ensuring equitable distribution of the costs of new infrastructure to support the new development, and ensuring a basic level of infrastructure is provided as the site is occupied. Contribution arrangements are crucial to meeting some objectives, notably affordable housing.

*Summary of mitigation proposals:* Define environmental improvements that might be funded more clearly (we understand the Council will address this in a Supplementary Planning Document).

*Secondary, cumulative or synergistic effects:* None; the policy aims to prevent cumulative effects of development on the broader existing community infrastructure. Overall, the absolute impact of the scale of the development should not be overlooked.

#### ***DP/2 – Sustainable development***

Development must be consistent with the principles of sustainable development in terms of form, design, materials and sustainable transport, as well as policy on mixed land-use developments.

*Summary of assessment:* Clearly a very sustainable policy as would be expected. Some socio-economic aspects are not mentioned explicitly but are adequately covered by other policies.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

#### ***DP/3 – Design of new development***

Establishes basic principles of what the Council will determine to be good design and links this to other, supportive policies.

*Summary of assessment:* Clearly sustainable.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* Although it is not necessarily clear in the assessment comments above, there are potentially strong synergies between providing well designed new developments and human health, residents' satisfaction with their surroundings, the attraction of an area as a good place to live, and the impact these factors have on attracting new employers and growing the sub-regional economy. In fact the effect is cyclical because this clearly adds to development pressure.

#### ***DP/4 – Development criteria***

Defines a broad range of criteria which will be used to assess desirability of development and cross-references these to other plan policies that define more specific objectives and requirements.

*Summary of assessment:* Clearly sustainable.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* Taken together with specific policies cross-referenced in the text, these criteria present substantial limitations which may act as a disincentive to development, even if they are consistent with current policy guidance.

#### ***DP/5 – Cumulative development***

Prohibits development on a piecemeal basis where larger-scale development would provide more coherent settlement patterns, and also ensures that a 'salami-slicing' approach cannot be adopted to circumvent certain planning criteria that depend on the size of the development.

*Summary of assessment:* An important policy given the limited supply of suitable, sustainable land as it supports the efficient supply of land (on a rolling basis). Clearly larger developments are intrinsically less sustainable than smaller ones in terms of their absolute impacts, but the former offer economies of scale in terms of infrastructure provision (especially through Section 46 agreements). Moreover, favouring larger scale development enables the various competing land uses (housing, amenity, play space, open space) to be reconciled with good design providing a more coherent settlement pattern, creating spaces that work well, and which would be more difficult to achieve if development occurs on a piecemeal basis.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* The policy aims to avoid secondary impacts on coherence and aims to exploit the economies of scale offered by larger scale developments (though it is not clear whether this is strictly a synergistic effect).

### **DP/6 – Construction methods**

Established broad requirements for the planning and operation of construction activities to minimise the impact of traffic, noise and other facets of site development on the surrounding environment.

*Summary of assessment:* An essential policy given the scale of development that will occur in the district.

*Summary of mitigation proposals:* Explicit mention could be made of the need for construction activity to conserve water, and possibly also problems of dust contamination given the amount of topsoil-stripping that will occur, and the recent reduction in NAQS thresholds.

*Secondary, cumulative or synergistic effects:* The cumulative impact of extensive development at several locations in the district will need careful consideration and integration at the Master Planning stage to ensure traffic impacts in particular are minimised, and to ensure noise, odour, and other impacts are contained by the phasing of development.

### **DP/7 – Urban frameworks**

Provides a general permit for the development of unallocated land within urban areas provided it is in keeping with local character.

*Summary of assessment:* Implicitly supportive policy encouraging extra land in settlements to be brought forward for development as appropriate. However the fact that such land lies outside allocations on the proposals map suggests the benefit may be negligible.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### **DP/8 – Village frameworks**

Restricts development in the countryside to rural land uses and aims to ensure development of unallocated land within village frameworks is in keeping with local character, will have no adverse impacts including the loss of amenity.

*Summary of assessment:* Sustainable – aims to support appropriate development in the countryside.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

## 4.4 HOUSING POLICIES

### ***HG/1 – Housing density***

Sets a minimum standard of 30 dwellings/ha. with higher densities desirable in central locations near services, amenities and public transport.

*Summary of assessment:* A sustainable policy consistent with current guidance on housing density. The policy encourages higher densities in appropriate locations although at lower rates than the possible maxima suggested by PPG3. We assume the Council would use its discretion to encourage densities closer to 50 dwellings/ha. in sustainable locations, but that the intermediate density of 40/ha. mentioned in the policy will prevent taller development that may be out of keeping with local or district building character.

*Summary of mitigation proposals:* None, apart from possibly suggesting the higher density suggested above in specific locations, although we expect this will be addressed subsequently in AAPs.

*Secondary, cumulative or synergistic effects:* Implicit synergistic effect from improving the efficiency of use of land stock and the flexibility it might give in designing and integrating other components of the development (amenities, open space, etc.) .

### ***HG/2 – Market housing mix***

Proposes a target mix of properties in terms of the number of bedrooms, which are based largely on a recent Housing Needs survey and which require at least 50% of new properties to have 1 or 2 bedrooms in order to redress an imbalance in housing demand and recent supply trends.

*Summary of assessment:* Given the importance of housing stock growth to the entire LDF this is clearly a key policy that does much of the work needed to realign housing provision with local needs for smaller units.

*Summary of mitigation proposals:* The supporting text acknowledges the share of 1 and 2 bedroom properties is lower than the level revealed by the Housing Needs Survey without fully justifying the reason. Assuming a further Needs Survey will be undertaken in 2-3 years time we suggest the supporting text might indicate the Council's intention to review the shares at that stage and adjust them for any new development permitted subsequently. Equally, this draft policy is Alternative Option 3 from the Preferred Options Report and the level of 1 to 2 bedroom provision is higher than envisaged by the Council originally. The rationale for this change in option needs to be made clear and we understand this will be addressed in the Monitoring Plan for the LDF.

*Secondary, cumulative or synergistic effects:* None identified.

### **HG/3 – Affordable housing within frameworks**

Sets a requirement that affordable housing should represent 50% of all new development for all sites comprising 2 or more dwellings. The policy reiterates the intention to levy developer contributions for affordable housing on new employment that increases local demand for this type of accommodation among key workers and similar groups.

*Summary of assessment:* Clearly consistent with current government policy and the strategy restated by the SoS in late January 2005. The supporting text justifies setting the threshold at 50% however it is not clear what impact this will have on developers' motivation to take forward very small sites, however this is addressed to some degree by policy HG/4

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### **HG/4 – Affordable housing funding**

Provides for adjusting policy HG/3 in exceptional circumstances, particularly on smaller sites where the level of affordable housing may affect the economic of provision. In such cases the policy provides for taking contributions to fund housing elsewhere.

*Summary of assessment:* Provides a contingency to ensure the low threshold at which affordable housing quotas apply does not act as a disincentive to development. We assume that the willingness to accept contributions in lieu of housing enables the Council to sweep such monies into a fund to fund affordable units in other locations where the economics are more favourable.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* Synergistic benefit appears to be the opportunity to sweep the contributions into a 'pot' so they can be used more effectively at other locations, hence avoiding fragmenting of the funding of this type of housing.

### **HG/5 – Exceptions sites for affordable housing**

Provides further spatial exceptions which relax development controls – including those on development in the Green Belt – to enable provision of 100% affordable housing plots in suitable locations that meet recognised local needs.

*Summary of assessment:* Suggests obvious sustainability issues in terms of the potential loss of undeveloped land, but this policy is used in exceptional circumstances and only when alternative sites are unavailable or exhausted. The policy might consider measures to remediate Green Belt or open space where this is lost though it is not clear how physical compensation might be funded.

*Summary of mitigation proposals:* See above.

*Secondary, cumulative or synergistic effects:* None identified provided such cases remain exceptions.

### ***HG/6 – Extensions to dwellings in the countryside***

Establishes the development criteria for modification of dwellings outside village frameworks to ensure change is appropriate in scale and character. Exceptional circumstances for the expansion of very small properties (eg. workers' cottages) are defined.

*Summary of assessment:* A policy that appears to be motivated by local conditions and the need to carefully control development in those instances where it is needed.

*Summary of mitigation proposals:* The policy text provides for exceptional extensions vertically and laterally, the latter based on a threshold of 50% increase. Criterion 4 which states that the proposed extension should be in scale with the existing dwelling, whereas the 50% threshold suggests quite substantial extension would be permitted for a potentially wide range of properties. There is also a clear disparity between this threshold and that applied by policy HG/7. Should the threshold be reduced, or at least substantiated?

*Secondary, cumulative or synergistic effects:* None identified.

### ***HG/7 – Replacement dwellings in the countryside***

Permits one-for-one replacement with some scope for expansion provided issues of scale and character with surroundings are respected. The policy specifically excludes replacement of caravans and other mobile homes with permanent dwellings.

*Summary of assessment:* A policy that appears to be motivated by local conditions and the need to carefully control development in those instances where it is needed.

*Summary of mitigation proposals:* Criteria should also reflect need to use appropriate materials as this policy covers demolition and replacement of the whole structure.

*Secondary, cumulative or synergistic effects:* None identified; assumed to apply to individual and isolated developments.

### ***HG/8 – Dwelling to support a rural enterprise***

Permits construction of new dwellings to house those working permanently on the land in well-established businesses. Exceptions are made to allow temporary housing for newer businesses where there is a clear commitment for the occupant(s) to remain in tenure.

*Summary of assessment:* Little to add as policy appears to address a need to maintain a rural labour force and to provide for its needs in the same way that broader affordable housing policy addresses the needs of other groups.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***HG/9 – Dwellings associated with horsiculture***

Precludes development of structures for horse-related activities within the Green Belt, and development elsewhere will only be permitted if it relates to an established enterprise and there are no suitable alternative sites.

*Summary of assessment:* Appears a sustainable policy based on the premise that intrusion and inappropriate development should be resisted whether they house humans or horses. One concern is the potential impact on the well-established horse-racing industry in the east of the district. We cannot calibrate its impact although we assume many of these enterprises are well-established and may need few additional stables or other facilities.

*Summary of mitigation proposals:* None.

***Secondary, cumulative or synergistic effects:* None identified.**

### ***HG/10 – Conversion of buildings in the countryside for residential use***

Limits conversion of structures (primarily those used for agriculture) as housing, other employment purposes or for live/work use. Other conditions ensure development, where permitted, is appropriate in scale, character and materials and offers flexibility to be adapted for a range of uses in the future.

*Summary of assessment:* Sustainable, supportive and consistent with related policies HG/7 and HG/8.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

## **4.5 SITE-SPECIFIC ALLOCATIONS POLICIES**

### ***SP/1a – Impington, North of Impington Lane***

1.42 hectares supporting 57 dwellings.

*Summary of assessment:* No significant impacts identified although the site does not currently have good vehicle access. Benefits from proximity to Histon and Impington centres, and it could also benefit if a station to serve the community is built on the guided busway, which passes the southern edge of the site.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### **SP/1d – Waterbeach – North of Bannold Road**

2.4 hectares supporting 85 dwellings.

*Summary of assessment:* This appears one of the most sustainable developments of those reviewed at this stage, reusing brownfield land for a modest expansion of an already sizeable and sustainable settlement. Immediate access to a small retail core and good rail services to Cambridge (and even London) appear particular strengths, and the infilling of currently abandoned land could provide mitigation for some of the surrounding properties,

*Summary of mitigation proposals:* See above. Developer contribution might also be sought towards expansion of primary education facilities.

*Secondary, cumulative or synergistic effects:* None identified.

### **SP/1e – Willingham, South of Berrycroft and East of Balland Field**

Just over 1 hectare supporting 31 dwellings.

*Summary of assessment:* A small development between residential development of different density on three sides and necessitating good design in providing for infilling at higher density while limiting intrusion on the existing properties.

*Summary of mitigation proposals:* In conjunction with policy SP/1f, make clear the desirability of seeking developer contributions to improve the social infrastructure in the village.

*Secondary, cumulative or synergistic effects:* Clear potential cumulative impact alongside development in policy SP/1f.

### **SP/1f – Willingham, West of High Street and North of Over Road**

4.82 hectares supporting 72 dwellings.

*Summary of assessment:* The Local Plan notes this allocation is necessitated by lack of development at previously allocated sites. Notwithstanding this the site takes some agricultural land on the west of the village, while the limited local amenities and employment suggest an increase in trips many of which may be by private car. The overall impact may be reduced in the medium term (or longer) if the community benefits from the creation of new amenities and employment in Northstowe, and if good public transport links are available

*Summary of mitigation proposals:* See above.

*Secondary, cumulative or synergistic effects:* None identified.

**SP/1h – Highfields Caldecote**

4.4 hectares supporting 76 dwellings.

*Summary of assessment:* Appears a potentially problematic site due to the location of the plot within two lines of housing, some problems of road access, the lack of employment, services and amenities in the village, and the potential difficulty of blending the high density proposed for this site into a ribbon-settlement in which most properties have large gardens.

*Summary of mitigation proposals:* See above for priorities.

*Secondary, cumulative or synergistic effects:* None identified; principal impacts are primary.

**SP/1k – Girton, North of Thornton Road**

9.45 hectares supporting 277 dwellings.

*Summary of assessment:* A sizeable development on the northern side of the part of Girton lying south of the A14. The main issues appear to be the integration of such a large extension into that part of the settlement, although this is offset somewhat by improving open space and provision of community facilities in the southern half of the community.

*Summary of mitigation proposals:* Principal mitigation requirement appears to be integrating the development into the existing settlement, recognising that it will have higher building density than in the adjacent, established areas. See below also.

*Secondary, cumulative or synergistic effects:* Possible impact on car commuting to the business park area if there is inadequate cycle access across to the east.

**SP/1m – Longstanton, North of Over Road**

22.23 hectares supporting approximately 500 dwellings.

*Summary of assessment:* This is the largest development in the plan, representing a very significant northwestern extension of Longstanton. The site has been assessed as suitable for development in previous plans, nevertheless it will still have substantial impacts in terms of its visibility from the surrounding land, demand for education and employment, and the effect both these will have on commuting patterns.

*Summary of mitigation proposals:* Access to the development should be prioritised towards Over Road to limit the impact on the existing village and ideally there might be a requirement to complete the bypass before a lower percentage of the development is complete, provided access can be provided (and subject to policy DP/4 point 2). Mitigation of the effects of construction will be necessary and is defined by policy DP/6. Screening and/or landscaping is recognised in the adopted Local Plan as necessary to limit the impact of the extension on the northwestern edge of the existing village and settlements to the north. Given the flat local terrain it appears this is more likely to involve vegetation screening, some of which can be integrated with mitigation measures for the bypass, which will also need to include noise abatement measures for the western edge of the development. This edge may also require modest flood protection as it abuts a floodplain to the west and these will need to be integrated with flood protection measures for the bypass which uses a substantial area of floodplain.

*Secondary, cumulative or synergistic effects:* There are clear cumulative impacts of this development taken alongside that of Northstowe, the first part of which is likely to be developed in a similar period. The need to limit access of construction traffic from the rural areas to the east of Longstanton suggest that impacts on traffic flows will start early and this would need careful coordination between master planning and operational planning for both this site and Northstowe. Furthermore, unless there is an early and substantial shift of commuter traffic onto the planned guided bus service, the development will add to local traffic requiring access to the A14 at Bar Hill, and contributing to congestion on the link into Cambridge and across to the northern business parks. Furthermore the scale of the development suggests a secondary impact on educational provision as existing secondary education facilities are above capacity and will not be provided early in the development of Northstowe.

### ***SP/1r – Papworth Everard – East of Ermine Street South***

3.81 hectares supporting 135 dwellings.

*Summary of assessment:* A sizeable development that will require sensitive design to accommodate dwelling densities higher than those in the rest of the village, and which do not adversely affect the visual character of the area which is part of the grounds of Papworth Hall. Along with policy SP/1t, development will put pressure on local education and new residents are more likely to seek work in Cambridge or the market towns to the north.

*Summary of mitigation proposals:* There is a clear need to protect the setting of Papworth Hall and the open land to the east from the effect of moderately dense new housing, and the rolling nature of the area may mean a mixture of vegetational and physical landscaping can be used. Specific mitigation measures to prevent impacts on the SSSI not far to the north must be implemented and will need to be defined in the detailed scheme and tested through the EIA process.

The policy states that developer contributions to the cost of the Papworth bypass would be sought. The lack of local employment and limited local facilities suggest the development could add to traffic in the south of the village, and it appears advisable to link the phasing of the development to the bypass.

*Secondary, cumulative or synergistic effects:* The principal secondary / cumulative impacts concern the effect of a substantial increase in population as a result of the parallel development of sites 3A and 3C in Papworth. Both will put strain on existing educational facilities and amenities, and the limited provision of core services in the village suggests an increase in local traffic if residents travel to nearby centres for these facilities. At this stage it is not clear to what extent development to either side of Ermine Street will be coordinated. Any impact in terms of dust, etc. on the SSSI must be avoided, and we assume also that this development would not occur in parallel with any redevelopment of the hospital site (see policy SP/11) which would cause further cumulative environmental quality and traffic impacts (see also the assessment for SP/1t).

### ***SP/1t – Papworth Everard – West of Ermine Street South***

11.98 hectares supporting 359 dwellings.

*Summary of assessment:* The assessment is best summarised as the same as for policy SP/1r, only more so, due to the size of the development.

*Summary of mitigation proposals:* There will be a need to integrate the internal design of the development with extensive visual mitigation measures protecting houses along the main road, the setting of Papworth Hall, open land to the west, and the hospital area and conservation area to the north. It is not clear how the construction might be phased with that of the eastern site, and also with the possible redevelopment of an industrial area on the southeast edge of the village (see policy SP/5). Noise mitigation will be especially important at the north end of the site due to the proximity of hospital grounds. As with SP/1r, it may be prudent to directly link the phasing of the development with construction of the bypass (not just its financing) to limit transport impacts. Moreover one of the principal access points appears to be at the extreme south of the site, opposite the entrance to the current (and possibly enlarged) industrial area, and this suggests a need for a small roundabout to control flow and access to both side roads.

*Secondary, cumulative or synergistic effects:* The main impacts are as for policy SP/1r. The principal concern is the cumulative impact of development at this site with that to the east of Ermine Street, the possible redevelopment of an industrial land allocation, and the construction of the Papworth bypass. All of these developments are potentially scheduled for the near future and suggest a prolonged period of disruption in a setting containing many highly sensitive receptors. These issues suggest the need for thorough coordination of the development briefs for each of the development although prolonged if not cumulative impact appears inevitable if all the developments go forward.

### **SP/2 – Cambridge Northern Fringe West**

Proposes redevelopment of an area of open land lying between the northern edge of Arbury and the A14. The site would be redeveloped for mixed land use comprising high-density housing, B1 employment uses, a small shopping facility and a station on the proposed Rapid Transit link to St Ives. The site is predominantly but not wholly within South Cambridgeshire.

*Summary of assessment:* Overall a sustainable policy to redevelop land previously identified in the Structure and Local Plans as appropriate for redevelopment under the conditions defined in RPG6. Development will entail some adverse impacts, including the loss of open land and increased energy and water use. However this can be weighed against the benefits of providing an interchange with the guided bus route to encourage modal shift, the efficient use of the land for mixed development, including higher density housing, and the questionable importance of the land under its current use as it is hemmed in between Arbury and the A14. This last point suggests the need for appropriate mitigation of noise from the A14, and the impact of possible widening of that road is not addressed in the current policy. The text currently provides for protection of the Arbury Camp archaeological site however it is difficult to provide further assessment as a master plan is not yet available.

*Summary of mitigation proposals:* The principal challenge appears to be accommodating the high density of the development within a relatively small plot of land while meeting open space and good design standards, and creating an area that people will want to live in. The nature of mitigation will become clearer once the master plan is available. See below also.

*Secondary, cumulative or synergistic effects:* The principal synergistic effect is the opportunity to provide an interchange on the guided bus route which will serve residents of the development and those in Arbury to the south. This would be maximised if there are good east-west links through the site which is elongated, and it would be appropriate to seek improvements to bus services along Histon Road which abuts the west end of the development.

### **SP/3 – Cambridge Northern Fringe East: Chesterton Sidings**

Proposes a mixed land-use development incorporating a rail interchange, housing and open space which needs to be integrated with north-south rail infrastructure and east-west routes which are primarily footpaths and towpaths to maximise its sustainability. The policy defines some broad objectives and content for the master plan of the site which has not yet been prepared. The site lies across the boundary between the District and Cambridge City.

*Summary of assessment:* The overall impact of the development is a little difficult to judge at this stage without a master plan indicating the layout of land uses, nevertheless it is clearly supportive of sustainable transport objectives and guidance in PPS1 which advocates mixed land-use development integrated with transport interchanges. The assessment assumes the primary benefits will be from the interchange between rail, guided bus, walking and cycling routes, and these will be available to residents in the new development, those in housing to the southwest, and those commuting into Cambridge from the north on rail and bus links.

*Summary of mitigation proposals:* The policy acknowledges the presence of a protected species on the site, the nature of which means it would have to be left in situ, affecting site design. The area to the east of the site is largely open watermeadow (with some vegetation barriers) and the design would need to incorporate elements to mitigate visual impact as well as providing some flood protection at the eastern edge which abuts the Cam floodplain.

In human terms, the key priority will be to ensure good access from the interchange to the employment sites to the northwest as this will help to encourage modal shift.

*Secondary, cumulative or synergistic effects:* The principal synergistic impact is the opportunity to shift commuters from cars onto alternative transport modes, and providing good links from the site to adjacent employment areas will be just as important as providing an interchange for links into the city centre (recognising also that Cambridge station is not located centrally).

#### ***SP/4 – Allocations for class B1 employment uses***

Proposed allocating two sites at Longstanton (6.3ha for mixed business and research use) and Pampisford (2.3ha for business use).

*Summary of assessment:* Both proposals provide for modest-sized land use changes with varying overall impacts. At Longstanton the development is envisaged as a campus-style business park consistent with similar developments around Cambridge. While this is consistent with the broader objective of strengthening the sub-region's excellence particularly in the research sector, neither this plan nor the Local Plan clearly define the precedents for these developments in the same way as those in policies SP/2 and SP/3. At Longstanton the development would introduce structures into an open and flat landscape. A further concern is the cumulative impact of development which is discussed below. At Pampisford the development would extend an existing light industrial site and therefore the overall impact would be less than at Longstanton. Neither site is particularly well-served by transport routes other than public roads, although both introduce new employment at the edge of existing settlements and it is assumed there is a strong match of skills in these communities with the needs of businesses occupying the sites.

*Summary of mitigation proposals:* Both sites appear to need some degree of visual mitigation, especially at Longstanton where the development will occur within a flat and open landscape with few vegetation barriers, and where on-site impacts such as light pollution must also be mitigated. Development at Pampisford will need limited flood protection as the site impinges on the Granta floodplain.

*Secondary, cumulative or synergistic effects:* The principal concern is the cumulative impact in the vicinity of Longstanton which would see the creation of a campus area of development, and loss of land to the bypass, both of which would add to the range of impacts on Longstanton from the development of Northstowe to its east, and the specification of the B1050 as one of the main routes into the new settlement.

### ***SP/5 – Allocations for class B1 and B2 employment uses***

Proposes allocations for sites at Gamlingay (4ha), Over (1ha) and Papworth Everard (6.5ha). All proposals reflect allocation proposals from earlier plans.

*Summary of assessment:* The policy proposes three small business or commercial (not industrial) developments, two of which extend existing B-class land use. It supports proposals to provide small-scale growth in rural employment which also supports sustainable transport and development objectives. The policy restricts land use change to business and research (rather than commercial / industrial) use which will help to limit its impact.

*Summary of mitigation proposals:* Main requirements are for visual mitigation, particularly at Gamlingay where the development would be overlooked by recreational areas, and at Papworth Everard where the site would be partly overlooked by the hospital if it is developed in the near future. Developers should be encouraged to submit transport assessments for redevelopment in line with policy DP/2. That at Papworth should also be linked to the proposed bypass and consideration may need to be given to delaying a change in use if it is likely to add to traffic levels through the village. Both requirements are covered by policies in the Development Proposals section.

*Secondary, cumulative or synergistic effects:* The policy aims to exploit synergies of providing rural employment in appropriate sites and sustainable transport objectives.

### ***SP/6 – West of St Mary’s church, Gamlingay***

Proposes a modest extension of the church’s graveyard.

*Summary of assessment:* Little to comment on. The policy involves land use change in the south-west corner of the village on a plot overlooked by housing. However it represents a largely sympathetic change of land use, leaving the site open and also more accessible. There are no clear local impacts, and the site is adjacent to the church and has road access.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***SP/7 – Allocations for open space***

Proposes to allocate adjacent to existing recreation grounds and playing fields to extend them in order to meet minimum targets for the provision of open space or improve quality of this space for certain schools at two sites in Over and one each in Stapleford and Longstanton. All policies have been saved from the adopted Local Plan.

*Summary of assessment:* Policies are sustainable, necessitated by government open space standards, consistent with those in the Structure Plan and in this DPD (SF/13). The Over playing field extension and land at Longstanton lie within the existing village framework, while that at Stapleford lies in the Green Belt. In each case the nature of land use change will retain the areas's open aspect, and improve access to recreational facilities without apparently affecting local character (ie. it is consistent with policies CH/6, DP/8 and GB/7, without compromising GB/8).

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***SP/8 – Character of village centres***

Proposes specific measures to control any change of use or redevelopment in the centres of Great Shelford and Histon, both of which are already congested, such that further problems would not adversely affect their character.

*Summary of assessment:* Consistent with Structure Plan policies and with those in this plan on retail development (SF/5) and protecting village character (SF/1). However, while this policy does not preclude appropriate redevelopment it appears to suggest these centres are close to capacity, with limited additional space for development and traffic problems. While this policy clearly aims to prevent a worsening of any access problems it also suggests an inconsistency with: their designation as Rural Centres in policy ST/2; their role in the retail hierarchy in policy SF/2; and sustainable development objectives (see policy ST/2 bullet point 2).

*Summary of mitigation proposals:* Resolve the apparent inconsistency outlined in the comment above.

*Secondary, cumulative or synergistic effects:* The policy appears to deal with cumulative effects of the growth of these two villages as rural service centres and, as such attempts to mitigate further adverse change. However, if this constrains further immigration of services and development it may be pushed into less sustainable locations. The impact of this development is unclear, and it should also be borne in mind that Northstowe and Cambridge East have higher priorities for growth as Rural Centres.

### ***SP/9 – Linton special policy area***

Proposes to constrain further development of the village to the south of the A1307 as this location is already severed from the main part of the settlement by the main road.

*Summary of assessment:* A preventative policy which recognises the dislocation of part of the existing settlement and aims to ensure it will not worsen. The policy text does not refer to measures to improve access for residents in the area and the assessment assumes that the Council is satisfied that the level of dislocation is acceptable.

*Summary of mitigation proposals:* See above.

*Secondary, cumulative or synergistic effects:* None identified.

### ***SP/10 – Former Land Settlement Association estates***

Safeguards land in Great Abington and Fen Drayton.

*Summary of assessment:* A sustainable policy designed to retain two quite substantial areas which are currently given over to small plots of agricultural use to prevent loss of resource and expansion beyond the village framework. The policy intrinsically supports many of the environmental objectives insofar as it prevents the land being used for purposes that might increase water or energy consumption, and is consistent with a policy in the Structure Plan.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***SP/11 – Papworth Everard village development***

Provides an outline of possible sympathetic redevelopment of the heart of the village in the event that Papworth hospital is relocated to an enlarged Addenbrookes site.

*Summary of assessment:* It is essential to distinguish between the impacts of relocating the hospital and the proposal in this policy for how the newly available land should be re-used. Relocation will have a huge impact on a small settlement largely based on the hospital and its associated facilities, and the policy attempts to compensate this to some degree by providing for additional employment and for amenities which will help to retain a coherent community during a period of change. The policy itself provides for sensitive redevelopment of the land occupied by the hospital, which represents a significant proportion of the southern half of the village framework, and to enable the settlement to re-establish itself after a significant change.

*Summary of mitigation proposals:* The key mitigation requirement will be the phasing of the redevelopment of the area to minimise its impact on traffic, noise, etc. (all of which would be addressed in more detail in subsequent development guidance and in an EIA) and to provide for a period of transition. Much of the redevelopment occurs in the southern half of the settlement and plans would also need to address construction traffic impacts.

*Secondary, cumulative or synergistic effects:* The primary secondary effect appears to be the impact of relocating the hospital on commuting patterns if those working in the facility choose to remain in Papworth Everard. This would clearly have an impact on traffic levels at a time when there may be additional traffic into the village as re

### ***SP/12 – Duxford Imperial War Museum***

Identifies the Museum as a heritage asset of international significance which should be treated as a special case, though controls on displays and both temporary and permanent development will persist.

*Summary of assessment:* Principally a procedural policy which cannot be assessed using these objectives. The policy protects its status while maintaining controls on activity on the site. We assume that the traffic impacts of events would continue to be managed and monitored by existing processes (as they are scheduled and advertised well in advance and therefore a known impact), while many of the on-site safety issues are the domain of the Civil Aviation Authority or the responsibility of the Museum's management and trustees. We assume non-display use of the airfield would be subject to policy TR/7.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

development begins.

### **SP/13 – New road infrastructure**

The policy proposes to safeguard land for a western bypass for Papworth Everard and a bridge to replace the level crossing at Foxton. It also proposes to seek developer contributions for a bypass to the northwest of Longstanton which is partially linked to a planning application for a residential extension to the village.

*Summary of assessment:* All three developments have clear adverse impacts in terms of sustainability. A particular concern is that in mitigating congestion the schemes would transfer impacts, such as noise, air quality and light pollution, to adjacent sites. For example, at Papworth the bypass would pass close to a conservation area that is currently some way from the main road through the village. All three schemes present potential problems because mitigation could introduce unnatural features into the landscape.

The proposals do little to encourage sustainable transport although this does not mean that the plan should ignore congested areas where traffic measures are essential, and we also acknowledge two of the developments reflect Structure Plan policies, though it is not evident whether any form of sustainability assessment / appraisal was conducted.

*Summary of mitigation proposals:* Appropriate mitigation would be needed for all three developments. Given the more rolling nature of the land around Papworth Everard it might be possible to intersperse low bunds with fencing, but this does not appear to be an option at Longstanton where both features would appear alien. In all three cases there appears to be a case for leaving the new layout unlit, although the impact of this would need further consideration on road safety grounds.

*Secondary, cumulative or synergistic effects:* The main potential impacts come from any knock-on effect of reduced congestion (or blocking in the case of Foxton) on traffic levels.

### **SP/14 – Rapid Transit**

States the intention to safeguard land for a guided bus way using part of the former Cambridge to St Ives railway. The policy also states the intention to seek developer contributions to fund developments of parts of this infrastructure.

*Summary of assessment:* The assessment markings are perhaps a little generous since they reflect the benefits of the Rapid Transit system itself (as a mechanism for modal shift and as a sustainable form of transport), whereas the plan policy merely safeguards land for this purpose. The only potential concern is the extent to which Section 46 contributions can be obtained since we assume that this mechanism will be already used extensively to fund other infrastructure in the Northstowe area.

*Summary of mitigation proposals:* Once work begins on the design of the system, consideration will need to be given to minimising the visual impact of the guide barriers, and to providing habitat mitigation or artificial movement corridors for wildlife in those areas where the existing line has been at least partially recolonised. However the policy in this plan does not require change. We understand these issues would be addressed by Cambridgeshire County Council which is responsible for taking forward the scheme.

*Secondary, cumulative or synergistic effects:* None identified (aside from cumulative transport impacts (benefits) of the system itself).

### **SP/15 – Rail infrastructure**

Proposes to safeguard land at Chesterton Sidings for a railway station and interchange facility.

*Summary of assessment:* A companion policy to SP/3 which deals specifically with the intention to develop a rail interchange that is integrated with other land uses proposed in the other policy. As such it clearly supports sustainable transport policy and the favoured mixed land use proposals of PPS1 and PPG13, as well as contributing to brownfield land utilisation targets.

*Summary of mitigation proposals:* See the assessment for SP/3.

*Secondary, cumulative or synergistic effects:* See the assessment for SP/3.

### **SP/16 – Rail freight**

Proposes safeguarding sidings and other facilities at five locations to ensure their continued availability for redeveloped as interchange facilities should this be required at a future (unspecified) time.

*Summary of assessment:* As with policy SP/14 the markings reflect the sustainability of the concept of providing rail interchange facilities where feasible in order to shift some freight traffic off roads. The policy itself is procedural, requiring only the safeguarding of land at this stage and is therefore clearly sustainable.

*Summary of mitigation proposals:* Impacts of increased HGV movements, including noise, light, and other impacts would need to be considered if redevelopment is taken forward, but are not drawbacks of the safeguarding proposal. Moreover in safeguarding this land the Council is providing advanced notice of the possibility of redevelopment.

*Secondary, cumulative or synergistic effects:* None identified.

### **SP/17 – Cambridge Airport safety zone**

Prevents development within the defined safety zone if it would increase the number of people likely to be within the zone. The exclusion appears to cover housing, employment land and any other land use that would cause people to congregate in the area.

*Summary of assessment:* Largely a procedural policy required by Dept for Transport regulations to ensure a minimum level of safety and protection for activities and land uses within the vicinity of the airport. While it might prevent use of land for employment thaty it is appropriate to co-locate with an airport, the limited activity and pending re-location of aviation activities means this is largely irrelevant.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### **SP/18 – Cambourne**

Proposes changing the master plan for the development to reflect higher housing densities required by the latest planning guidance on housing.

*Summary of assessment:* Largely a procedural policy necessitated by changes to housing policy that have been enacted since the construction of Cambourne began. It is sustainable insofar as it will provide additional housing within the existing framework (but with some modifications of layout, presumably) and some corresponding growth in communal infrastructure. We understand that the business park has higher employment density than envisaged and this will clearly contribute to reduced commuting.

*Summary of mitigation proposals:* The point above suggests improvements in public transport provision or travel choice are needed to support expansion on this scale. Also revision of the master plan should ensure the re-design does not reduce the provision of open space within the settlement, nor should it obstruct green corridors and similar features (this is covered in principle by policy SP/19).

*Secondary, cumulative or synergistic effects:* Possible impact of increased commuter traffic on the A428 in particular.

### **SP/19 – Cambourne approved master plan and design guide**

States the plan for a settlement comprising three villages connected to a service/amenity core by a ‘spinal’ road; separated by open space in keeping with local settlement character, which will also be reflected in building design and materials.

*Summary of assessment:* Another largely procedural policy establishing the primacy of the master plan and the requirement for development to meet the basic principles of design, materials, resource efficiency, etc. that are established by other policies, and the overall layout of the settlement.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***SP/20 – Cambourne School Lane special policy area***

Proposes the area as a special case for development at housing densities lower than those prescribed by PPG3 and policy HG/1 in order to provide appropriate layout at the border between part of the settlement and open land.

*Summary of assessment:* The policy aims for low density housing to preserve character in a sensitive area of the development. It does not indicate the scale of development (ie. area, no. of homes involved). Information in the text supporting the policy does not clearly support this as a sustainable development since it will occur in an area of local biodiversity value, and the intrusion of housing into the area – even at low densities – will have an impact on character.

*Summary of mitigation proposals:* Would require mitigation as specified in policies DP/2 and DP/3.

*Secondary, cumulative or synergistic effects:* None identified.

## **4.6 ECONOMY & TOURISM POLICIES**

### ***EM/1 – Limitations on the occupancy of new premises***

Identifies priorities for non-housing and recreational uses which reflect on the sub-region’s acknowledged strengths while providing for additional development in other usage classes to maintain a wider economic base.

*Summary of assessment:* The policy clearly aims to prioritise non-industrial land development towards the sub-region’s strengths in R&D and IT. An additional condition recognises the need, however, to maintain the broader base of opportunities for other categories (managerial, semi-skilled, etc.) which will be essential for provide employment for the wider population of the region. Potential drawbacks include the siting of such facilities in research parks and campus sites (not mixed land-use) and impacts on use of natural resources (which are discussed below).

*Summary of mitigation proposals:* It will be necessary to ensure that provisions in policies DP/1 and DP/2 on infrastructure and sustainable development apply also to these developments irrespective of their status, and that they should be well-served by a choice of travel modes. Both requirements could be met by a short statement requiring consistency with nominated policies.

*Secondary, cumulative or synergistic effects:* The need to expand the sub-region's capabilities in this area to maintain its leading position need to be balanced against the demands it makes on supply of energy and water, and the waste materials that some research sectors produce. Its principal competitor – Silicon Valley – suffers from similar constraints and it would be useful to understand how (or whether) they have affected the pace of development. In terms of absolute impacts, the government requirements for housing growth can be used as a mitigating argument for building new settlements in spite of the obvious impacts on natural resource use. Cambridgeshire's R&D expertise is internationally recognised, but it is not clear what strategic importance (in the national interest?) can be used to justify continuing substantial development if it makes additional demands on natural resources within the district.

Note also that point 4 of this policy sets a maximum of 1850m<sup>2</sup> size on classes of industrial development of sites, and that this would apply to the site in perpetuity to control of development (ie. it would not result in successive phases of development each within this threshold).

### ***EM/2 – Meeting housing needs from employment development***

Requires developers bringing forward employment land to contribute to affordable housing provision for key workers where appropriate, or to provide housing within the development .

*Summary of assessment:* Clearly a supportive and sustainable policy designed to reduce housing barriers in order to encourage key workers to stay within or more into the local economy to support other areas of activity. The main concern is the impact of financial burdens on organisations employing key workers which may themselves have limits on funding for this requirement.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* Synergistic (marginal) impact by supplementing affordable housing provision through other channels.

### ***EM/3 – Promotion of clusters***

Encourages development that will cluster prioritised activities such as biotechnology, R&D, etc. in specific locations. The policy is cross-referenced to the Northstowe and Cambridge East AAPs as both developments provide the opportunity to design clusters into new settlement patterns.

*Summary of assessment:* A further policy (alongside EM/1) designed to play to the region's strengths. Other potential benefits are discussed under synergistic effects below. However the concerns about the sustainability of extensive new development raised for policy EM/1 apply here also, with resource demands and waste arisings concentrated in relatively small areas.

*Summary of mitigation proposals:* As with EM/1 provision of good travel choice for clusters is essential to ensure their impact on commuting patterns is mitigated

*Secondary, cumulative or synergistic effects:* One benefit is the possibility of attracting additional supportive employment around the clusters, in the way that automotive parts manufacturers cluster around car assembly plants.

#### ***EM/4 – Development in established employment areas in the countryside***

Provides scope for additional infilling on larger sites and campus areas of employment land outside settled areas provided the overall scale is limited and local impacts are negligible or mitigated.

*Summary of assessment:* A ‘safety net’ policy providing for carefully controlled incremental expansion on larger rural employment sites which, depending on land uses, may be consistent with the clustering strategy proposed in EM/3. However it is important that developers recognise that the size of each site is finite (as further expansion is restricted by other plan policies) and that permitting infilling should not contribute to, rather than relieve, development pressure.

*Summary of mitigation proposals:* See below for an issue that may need to be addressed.

*Secondary, cumulative or synergistic effects:* It will be important to ensure that the policy does not provide scope for ‘salami-slicing’ of development on these sites. Depending on the type of land use, infilling may be on such a small scale that it falls below the threshold at which EIA is necessary, and issues such as traffic impacts may not be investigated. It will be essential to monitor the ongoing scale of development at these sites to assess their cumulative impact.

#### ***EM/5 – New employment development***

Provides opportunity for small-scale employment development to facilitate development of clusters or to maintain / expand the level of rural employment.

*Summary of assessment:* A sustainable policy designed to ensure some beneficial and suitable development of new employment can still occur in rural centres away from parkland and campus complexes of the clusters and existing sites covered by EM/3 and EM/4. Although development is to be focused in larger settlements, a threshold of 25 employees for ‘small scale’ would be each development could add substantially to the amount of locally-available employment. Clearly this is potentially beneficial in reducing the distance between home and work, and in sustaining the rural economy, however some of the land uses envisages could involve large structures for land uses that are not particularly labour-intensive (eg. warehousing buildings) and this should not be allowed to have a negative visual impact.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* As with other employment land policies, the planning duty will need to monitor the longer-term trend in such developments to assess a range of impacts on traffic, etc.

### **EM/6 – Expansion of existing firms**

Provides for the expansion of firms within a wide range of settlements provided the enterprise is well-established and the growth will not result in undesirable environmental impacts.

*Summary of assessment:* Another policy designed to ensure increased focus of development on urban centres and in clusters does not prejudice the scope for development in smaller communities to support their vitality and to reduce commuting trips even if such benefits are only delivered on a small scale.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* A further policy with possible cumulative effects that will need to be monitored in the longer term.

### **EM/7 – Loss of rural employment to non-employment uses**

Aims to prevent the loss of employment land in rural settlements unless this would eliminate adverse impacts of the existing development or provide compensating benefit.

*Summary of assessment:* A sustainable policy designed to sustain rural employment unless there are compelling reasons to change land use.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified. There is an overall issue concerning the progressive loss of employment in rural areas but this would be symptomatic of a deeper problem that would have to be addressed by a strategic policy.

### **EM/8 – Conversion of rural buildings for employment**

Provides for limited conversion primarily of unwanted agricultural buildings for a range of small-scale commercial (not industrial) uses, provided development is appropriate in scale to the location and does not result in adverse impacts (eg. on traffic).

*Summary of assessment:* A very sustainable policy the importance of which is easily missed. Affordability is focused almost entirely on housing yet businesses, and particularly those in rural areas which may have limited capital and modest cashflows, also need a supply of affordable local premises, which is what this policy facilitates.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***EM/9 – Replacement buildings in the countryside***

Provides for replacement of buildings that will support employment use with similar controls to those for policy EM/8.

*Summary of assessment:* Little to comment on – same overall benefits as EM/8 with a slight change in circumstances.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***EM/10 – Farm diversification***

Encourages farm diversification provided it is consistent in scale and scope with existing and surrounding land use.

*Summary of assessment:* Sustainable policy designed to support farm diversification. We recognise that farms may have limited funding to provide supporting planning statements and other documents, but it will be essential that there is a mechanism to ensure that environmental impacts are fully considered and mitigated.

*Summary of mitigation proposals:* See above.

*Secondary, cumulative or synergistic effects:* None provided the number of developments is restricted.

### ***EM/11 – Tourism facilities***

Requires new tourism facilities to be consistent with local character and land use. The policy encourages further development of the existing tourism and heritage assets rather than the creation of new ones.

*Summary of assessment:* Sustainable in that it proposes careful management of the expansion of existing tourism facilities both to control their impact and to support the promotion of Cambridge as a principal English tourist destination.

*Summary of mitigation proposals:* Countryside attractions will inevitably generate traffic. While the need to address this issue may be implied by other policies, we recommend that the policy should indicate that development at sites well-served by existing transport facilities, particularly those offering travel choice will be prioritised (or particularly encouraged).

*Secondary, cumulative or synergistic effects:* See above.

### ***EM/12 – Tourist facilities and visitor accommodation***

Limits provision of these facilities to conversion of premises in locations outside existing settlement frameworks and will only be permitted for short-stay accommodation.

*Summary of assessment:* Appears a sustainable policy provided there are clear controls on the scale of development which ensures that traffic impacts are negligible. This issue highlights a slight inconsistency with the content of EM/11 which presumes Cambridge remains the primary tourist destination. Clearly a parallel urban policy must be prepared by the City Council but if the above reflects sub-regional priorities then we assume there is limited need and scope for this form of development.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

## **4.7 SERVICES & FACILITIES POLICIES**

### ***SF/1 – Protection of village services and facilities***

Establishes measures to prevent undesirable loss of key village services and amenities.

*Summary of assessment:* Clearly a key policy in terms of preserving a basic level of amenity even in group and infill villages.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***SF/2 – Retail hierarchy***

Identifies a hierarchy which identifies priorities for new development of retailing reflecting the size, accessibility and sustainability of the settlements, and which is consistent with the broader settlement hierarchy established in policies ST/2 to ST/5.

*Summary of assessment:* A key sustainability policy that builds a coherent hierarchy for all facets of development when the links between this policy and those on settlement and housing are taken together. Any concern that this prioritises larger settlements at the expense of smaller ones must be offset by recognising it provides scope to link retail strategy with provision of public transport to shorten trips and encourage more of them to be made using modes other than the private car.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* One concern is the need to coordinate this policy with equivalent policies for Cambridge city, which remains the sub-region's principal retail centre. It is not clear how the sequential test works across authority boundaries, and how the need to sustain Cambridge can be balanced against the need to build district centres at Northstowe and Cambridge East. Equally there is a concern about the tension between this policy, SF/3 and SF/1 if focusing development priorities on larger centres affects the catchment and viability of shops in smaller settlements. This problem exists regardless of whether new retail development is located in central Cambridge or around its periphery.

### **SF/3 – Applications for new retail development**

Requires the use of a sequential test to justify applications to develop new retail sites away from the centre of the largest settlements. It also aims to prevent out-of-town developments and to steer new retailing to sites which offer good travel choice.

*Summary of assessment:* Clearly sustainable and supportive of SF/1 and SF/2.

*Summary of mitigation proposals:* None, although there is a slight concern that the policy text appears to treat Northstowe as a special case with provision for other centres mentioned only in the supporting text.

*Secondary, cumulative or synergistic effects:* See comment for SF/2.

### **SF/4 – Retail development on land allocated for other uses**

Prevents reallocation of land allocated to housing specifically, and potentially to other uses, except where this would not compromise achieving Structure Plan targets. Some latitude is available for reallocation to support mixed land-use developments that conform to policies SF/2 and SF/3.

*Summary of assessment:* Little to comment on – clearly sustainable and consistent with other services and facilities policies.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified. The contingency provides flexibility to allow reallocation in appropriate locations and which could help to reduce development pressures at other locations.

### **SF/5 – Retailing in villages**

Limits the scale and scope of retailing development in villages to that consistent with local requirements and setting.

*Summary of assessment:* Clearly sustainable and supports maintaining village character.

*Summary of mitigation proposals:* It would be helpful to reword the second clause to improve clarity as it appears to begin with a double negative.

*Secondary, cumulative or synergistic effects:* None identified.

### ***SF/6 – Retailing in the countryside***

**Limits retailing to activities consistent with rural activities including, but not restricted to, agriculture. Some latitude is given to allow sale of convenience goods**

*Summary of assessment:* Clearly sustainable.

*Summary of mitigation proposals:* None, but see below.

*Secondary, cumulative or synergistic effects:* The Council will need to monitor the growth of such ventures to ensure there is no cumulative effect of increased rural traffic.

### ***SF/7 – Public art and new development***

States the objective that public art will be provided as an integral part of new development, and that the Council will seek developer contributions in appropriate circumstances to part-fund provision.

*Summary of assessment:* Sustainable in a supportive way.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***SF/8 – Telecommunications***

Controls the provision of telecommunications masts to limit their visual impacts and implicitly to address public health concerns. A contingency allows approval to be given if no suitable alternative site can be found.

*Summary of assessment:* Although sustainable in principle, the policy leaves some issues unanswered. The supporting text specifically to broadband services, although local access to these services are primarily carried in terrestrial cables. However the text appears to focus on mobile telecomm services whereas such structures are also needed for other high-capacity communications links that are part of the national infrastructure. It is not clear how the issue of environmental impact would be reconciled against issues of overriding national or commercial interest given their obvious importance.

*Summary of mitigation proposals:* See above.

*Secondary, cumulative or synergistic effects:* Any increased requirement for masts would appear to be intrinsically cumulative. These masts support a mobile service and therefore expanding capacity in one radio cell is likely to lead to demand for additional capacity in adjacent cells to provide unbroken service.

### **SF/9 – Underground pipes, wires, fibres and cables**

Aims to prevent damage to ecological assets, particularly by linear features constructed at or below ground-level.

*Summary of assessment:* Little to comment on – clearly intended to limit prevent damage by linear structures.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### **SF/10 – Lord’s Bridge Radio Telescope**

Prevents development that would adversely affect operation of facilities at the Mullard Radio Astronomy Observatory.

*Summary of assessment:* A very specific policy which cannot be assessed as it applies controls to a specific site to protect an internationally important asset which itself has no significant environmental impacts.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### **SF/11 – Protection of existing recreation areas**

Limits the scope to redevelop recreational land for other uses unless there are superior compensating benefits or provision of an equivalent amount of new recreational space elsewhere.

*Summary of assessment:* A key component of good urban design and retention of the existing recreational space is essential in the light of the considerable housing development that will be occurring in the district.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***SF/12 – Outdoor playspace, informal open space and new developments***

Defines requirements for the provision of various forms of recreational space within and proportional to the scale of new development. The policy also establishes the Council's intention to seek developer contributions for these facilities.

*Summary of assessment:* Clearly supports objectives of sustainable and inclusive communities.

*Summary of mitigation proposals:* None. Separately the Council has indicated that its approach to securing funding for these amenities from developer contributions will be detailed in a separate SPD.

*Secondary, cumulative or synergistic effects:* None identified.

### ***SF/13 – Open space standards***

Specifies the minimum requirements for providing various forms of open space for informal and formal recreation, and designates the type of facilities to be provided, these requirements being consistent with government guidance and policy SF/12.

*Summary of assessment:* As for SF/12, however the definition focuses on the basic infrastructure and the desirability of a suitable, secure location which is extensively overlooked is not mentioned. We understand that these issues will be addressed in a separate SPD to be issued subsequently.

*Summary of mitigation proposals:* See above.

*Secondary, cumulative or synergistic effects:* Playspace and other forms of open space are a further resource competing for limited land within a new development and this impact should not be overlooked. However other policies – notably DP/5 (cumulative development) are consistent, encouraging development in larger chunks to improve coherence and greater flexibility in integrating the need for this space with increased housing density.

### ***SF/14 – The River Cam***

Limits the extension of marinas and moorings on the river.

*Summary of assessment:* Clearly intended to protect the quality of a key local asset without preventing continued use and carefully managed growth in facilities. It will be essential to afford thorough protection to stretches of the Cam within the district that have key heritage associations, although this would presumably be delivered through other policies.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

## 4.8 NATURAL ENVIRONMENT POLICIES

### ***NE/1 – Energy efficiency***

Prescribes a range of measures to improve the energy efficiency of new and re-developed properties which will be adopted as an SPD at a later date. Encourages developers to seek 10% improvement on CO<sub>2</sub>/m<sup>2</sup> emissions compared to minimum Building Regulations.

*Summary of assessment:* Supports *reduction in energy consumption and emission of greenhouse gases*. The Council appears to have set a fairly low and easily achievable threshold for this policy. There is clear potential long-term impact on energy consumption if there is a large-scale growth in housing and other forms of development during the lifetime of the initial LDF, and this policy must maximise positive impacts.

*Summary of mitigation proposals:* The policy has four components: the stipulated threshold; the calculation method; the assessment structure (Building Regulations); and the policy requirement ('encouragement' rather than obligation). Our initial assessment has proposed that the Council should adopt an alternative policy approach to enforce more stringent targets. However the Council has advised us that it limited scope to implement higher targets and that the main mechanism for this would be through changes to the Building Regulations.

*Secondary, cumulative or synergistic effects:* Potential increase in the stock of energy-inefficient buildings if new requirements do not keep pace with projected change in sustainable construction standards.

### ***NE/2 – Renewable energy***

Renewable energy developments will be permitted where these do not infringe district-wide development criteria, where there is ready access to the National Grid, and the land can be redeveloped subsequently for other purposes.

*Summary of assessment:* Clearly supports reduced reliance on non-renewable sources, however the incremental provision of technology suggests benefits will grow slowly. Baseline data does not enable comparison of current performance with national average, and any shift in target generation levels may require reconsideration of the position on windfarms and other approaches.

*Summary of mitigation proposals:* No mention of biomass as a way of meeting targets while also supporting farm diversification and keeping farmland under agricultural use.

*Secondary, cumulative or synergistic effects:* None identified in the policy as proposed.

### ***NE/3 – Renewable energy technologies in new development***

Developments larger than 1000m<sup>2</sup> or 10 dwellings will include technology enabling at least 10% of their energy to be derived from renewable sources.

*Summary of assessment:* Policy encourage developers to build energy-efficiency into the housing stock, and this is clearly valuable given the scale of growth that will occur in the plan period. The baseline data suggests the District performs well against regional and national comparators, but this should not mean a slackening of the promotion of renewables. One concern is the possible impact of technology cost on the price of new units, and the impact this might have on affordable housing provision however we recognise that a balance must be struck between the suggestion for NE/1 or more stringent targets for providing this technology and its impact on house prices.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* Obvious long-term impact on the District's energy consumption although limited provision suggests this will be an incremental change.

### ***NE/4 – Landscape character areas***

The areas will be defined on the Proposals Map, and development within these areas will only be permitted if it is sympathetic to local character and distinctiveness. Design policies will be detailed in an SPD to be produced at a later date.

*Summary of assessment:* Supports objectives of respecting *landscape character* and (indirectly) maintaining the natural features of the landscape that sustain and *enhance biodiversity*. Some problems may be experienced with expansion of settlements, however these will be addressed in part by other policies in this DPD, notably those supporting the Green Belt.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***NE/5 – Countryside enhancement areas***

Takes forward Cambridgeshire Structure Plan policy 7/3 to identify areas for enjoyment of the countryside and to take steps to enhance their natural characteristics while preserving tranquillity.

*Summary of assessment:* Supports the District's Biodiversity Strategy and is consistent with other policies (eg. GB/8) although the degree of overlap is not clear.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* The supporting text envisages implies synergistic effects from combining enhancement programmes in certain localities. Presumably this will enable cost-effective provision of improvement of sustainable access.

### **NE/6 – Biodiversity**

Overarching commitment to maintaining and where possible enhancing biodiversity that prioritises prevention over mitigation and compensation.

*Summary of assessment:* A clear statement of support for supporting and *enhancing biodiversity* which is pragmatic insofar as it recognises the need to weigh conservation and development objectives in certain locations. It establishes a clear priority based on scarcity/importance (development will be resisted) and the measures used to resolve clashes between development and conservation, and also establishes the principle of using Section 46 developer contributions to fund appropriate measures.

*Summary of mitigation proposals:* Replace reference in supporting text to Section 106 with Section 46/47 (change has been made in policy NE/6). See also comments for NE/7.

*Secondary, cumulative or synergistic effects:* It is difficult to identify specific benefits. Much concern with biodiversity change has focused on the loss of woodland and farmland bird species. Clearly this will be addressed by this very broad policy, with specific activities dictated by other policies such as GB/8 and NE/5.

### **NE/7 – Sites of biodiversity importance**

Establishes the controls on development that reflect the relative biodiversity importance of sites, corresponding to the strength of conservation designation.

*Summary of assessment:* The policy establishes a basic protection policy for sites covered by a range of designations, reflecting their scarcity and importance, and consistent with PPG9. In fact the inclusion of protective measures to County Wildlife Sites suggests a greater degree of protection that might be warranted by the status of these sites, but it is within the Council's discretion to do this. The policy also makes specific reference to scrutiny of applications affecting SACs/SPAs/SSSIs, and the need for careful assessment of any indirect effects.

*Summary of mitigation proposals:* The supporting text states that policy NE/6 suggests additional planning controls to ensure that development prevent people enjoying wildlife sites. This is not evident in the text for NE/6 and it is not clear, therefore, whether this is actually a reference to NE/7.

*Secondary, cumulative or synergistic effects:* None identified, although clearly the policy is intended to prevent secondary impacts on important sites and to provide a structure for appropriate levels of conservation to prevent progressive loss of habitat.

### **NE/8 – Natural Areas**

Prohibits development that would adversely affect biodiversity and nature conservation value of designated Natural Areas.

*Summary of assessment:* Extends the scope of conservation beyond the boundaries of designated sites to cover the broader Natural Areas (a non-statutory designation). The main problem with this policy is that it sets an overall objective without making it clear how biodiversity harm would be assessed consistently from one site to the next.

*Summary of mitigation proposals:* Consider removing this policy or merging it with NE/6.

*Secondary, cumulative or synergistic effects:* None identified.

### **NE/9 – Species protection**

Prohibits development that would adversely affect species protected in UK law, although provision is made for mitigation.

*Summary of assessment:* Affords mandatory protection to certain species consistent with UK law and international biodiversity conventions.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified as effects would be confined to specific sites.

### **NE/10 – River valleys**

Identifies the biodiversity importance attached to the district's principal river valleys. Guidance is contained in the Council's Biodiversity Policy.

*Summary of assessment:* This policy recognises the particular value of certain river valleys and ensures that they are afforded an appropriate degree of protection through the Biodiversity Policy, where this is not already provided by designations for part of their length and broad overarching conservation principles.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None.

### **NE/11 – Countryside enhancement areas**

Indicates intention to nominate these areas and coordinate conservation measures with the existing Biodiversity Policy.

*Summary of assessment:* In principle provides for biodiversity conservation and enhancement across a broader range of areas than those covered by other policies.

*Summary of mitigation proposals:* None.  
*Secondary, cumulative or synergistic effects:* None.

### **NE/12 – Regionally important geological and geomorphological sites**

Affords protection to natural features although no such designated sites exist in the district at present.

*Summary of assessment:* A safety net policy to ensure the natural physical features are afforded protection comparable to that given to biodiversity assets.

*Summary of mitigation proposals:* The policy text refers to Section 46 agreements which needs to be qualified by additional text. Whereas biodiversity can be compensated by translocation and habitat recreation, the loss of physical landscape features is more final and difficult to compensate. This issue should be taken into account when reviewing planning applications, balancing the loss of the feature against the importance of or need for the development.

*Secondary, cumulative or synergistic effects:* None identified.

### **NE/13 – Groundwater**

Prohibits development that threatens groundwater resources.

*Summary of assessment:* Sustainable in providing overarching protection of groundwater resources.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* The supporting text refers to the need to recharge groundwater and clearly the large scale developments included in the LDF will have substantial effects on local rates which need to be addressed. However policies NE/14 and NE/17 deal with preventative and mitigation measures and have parallel policies in the corresponding AAPs. All address the supply-side issues which mirror the demand-side focus of this policy.

### **NE/14 – Water and drainage infrastructure**

States the requirement that development proposals must show adequate provision for water supply, removal of foul water, and other drainage that is consistent in scale with the phasing of the development. The policy makes clear the Council's obligation to coordinate these matters for large-scale development, but that developers must liaise with water companies for smaller sites.

*Summary of assessment:* Little to consider as this policy makes clear it is essential that development and provision of the supporting infrastructure (in this case water supply) are coordinated from the outset.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* Clearly the principal cumulative effect concerns the demands made of local water supply by the scale of development that will occur in the district over the next 10-15 years. That is not addressed by this policy which is primarily concerned with ensuring the timing of supply. It is assumed modelling of water demand has been undertaken already, and that supply rates will be monitored during development to ensure supply and demand are matched.

### **NE/15 – Foul drainage: alternative drainage systems**

Defines requirements for providing sewerage facilities for most forms of development including structures and the road system, and for special provision for sites producing slurry or effluents.

*Summary of assessment:* Clearly a sustainable policy requiring the provision of adequate and appropriate infrastructure to remove solid and liquid effluents, or for their storage.

*Summary of mitigation proposals:* None; policy DP/6 also provides for protection of ground and surface water resources from contamination during construction.

*Secondary, cumulative or synergistic effects:* See above.

### **NE/16 – Flood risk**

Proposes to restrict all development in designated high flood risk areas, and development in some areas where the lower level of risk cannot be substantiated and / or minimised, and to prevent development which might contribute to flood risk.

*Summary of assessment:* Given the district's position at the edge of the fens, an essential policy prohibiting development in risky locations. The policy wording and supporting text provide flexibility in permitting development in areas of lower risk provided that appropriate defensive or mitigation measures are provided, and that these are appropriate to the estimated risk/

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* The main potential issue is the increase in impermeable surface areas as a result of the major new development, although this is addressed by policy NE/17.

### ***NE/17 – Sustainable drainage systems***

Requires the use of SUDS where appropriate and establishes the right to seek Section 46 contributions for this infrastructure.

*Summary of assessment:* Another policy stating an essential measure required by the vulnerability of parts of the district to flooding, and the need to address water shortages by maximising the rate at which groundwater resources can be recharged.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***NE/18 – Water conservation***

Mandates the incorporation of water-efficient and water-saving technologies into new development, while ensuring this does not adversely affect the water environment.

*Summary of assessment:* A further sustainable policy necessitated by limitations on the district's water supply. One slight concern is the impact of technology costs on the price of new housing, however this should be offset by the scale of new construction which should mean the unit cost per home is lower than, say, retrofitting to an existing property.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***NE/19 – Hazardous installations***

States a procedural and legal requirement to consider human health risks and other impacts when considering planning applications for developments where hazardous substances will be present.

*Summary of assessment:* A further largely procedural policy reflecting the Council's obligations to prevent development in locations where the nature of the materials or activities constitute an unacceptable risk to human health and/or safety.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None.

### **NE/20 – Lighting proposals**

Identifies five requirements for external lighting (implicitly for both routes and sites).

*Summary of assessment:* Addresses issue of increased awareness of the impact of light pollution on the character of the area, and the particular impact in rural areas. Applying policy to new development limits its overall impact in an area where skyglow is already a problem.

*Summary of mitigation proposals:* Is it practical to consider measures to address the problem with existing light sources, or to survey where the problems are worst.

*Secondary, cumulative or synergistic effects:* The existing problem is the principal cumulative effect; the policy proposals will limit further problems but not redress the root cause.

### **NE/21 – Noise pollution**

Establishes policy principles to prevent unacceptable noise from new development; to prevent new development where ambient noise levels might be unacceptably high; and general conditions under the EPA to prevent noise nuisance.

*Summary of assessment:* Policy establishes measures to prevent increases in ambient and point-based noise from new development, and to ensure new development will not be subjected to noise from existing sources.

*Summary of mitigation proposals:* The policy and supporting text appear to refer principally to noise in settlements. Other Natural Environment policies propose establishing areas of tranquil countryside and it appears appropriate that this over-arching policy should include measures (at least in outline) that support NE/5 for example.

*Secondary, cumulative or synergistic effects:* None identified.

### **NE/22 – Emissions**

Requires development proposals to identify and mitigate / minimise emissions to prevent impacts on the surroundings, and to comply with relevant pollution control regulations.

*Summary of assessment:* An essential policy outlining the need to prevent contamination by pollutants, whether airborne or carried by other media, and which is particularly necessary given the potential impacts of major phases of construction at Northstowe and at Cambridge East.

*Summary of mitigation proposals:* Possibly make clear the controls apply to dust also. Policies in the Transport section mandate the provision of a Transport Assessment, should the Council encourage good/best practice by suggesting that developments likely to generate pollutants or emissions should be supported by a Health Impact Assessment. In order for this to be practicable we assume there would need to be a size threshold above which this option might apply.

*Secondary, cumulative or synergistic effects:* Clear impacts from the scale of development, although this would be mitigated to some degree by the phasing of development on both of the principal sites.

Comment: in terms of logical grouping should policy NE/19 be placed next to NE/22 and NE/23 as all three concern emissions or forms or risks of contamination by materials?

### ***NE/23 – Land contamination***

States the procedural requirement to investigate the nature and extent of contamination in all development proposals where there are reasonable grounds to assume this is an issue, and to implement appropriate treatment and monitoring of the site.

*Summary of assessment:* A high-level statement of the Council's obligation to ensure new development does not constitute a risk to human health, and which is given added weight by the large volume of housing development in the district that will occur on former military and industrial land.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***NE/24 – Protecting high quality agricultural land***

Establishes a blanket ban on any development that takes Grade 1, 2 or 3a agricultural land without providing scope to return it to its current use.

*Summary of assessment:* Clearly an essential policy to safeguard one of the district's strategic resources.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* There is a potential impact of land shortages on provision of housing and employment land in the longer term, though this cannot be quantified at present. However the policy does allow for a pragmatic position, recognising some loss of land will occur in the current plan period.

## 4.9 CULTURAL HERITAGE POLICIES

### ***CH/1 – Historic landscapes***

States that planning permission will not be granted for development that will affect historic landscapes regardless of whether or not they are covered by statutory designations.

*Summary of assessment:* Clearly another sustainable policy which gives the Council broader power to turn down development applications which would adversely affect the local landscape. It is not clear what protection this policy affords in addition to those on Green Belts, protection of biodiversity, protection Natural Areas, and other CH/ policies. However this does not mean it should be dispensed with. Note that a number of the major developed sites addressed by policy GB/6 are in parkland settings and this policy should also control the nature of development at those sites.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### ***CH/2 – Archaeological sites***

Prevents development without inspection by experts to assess a location's importance in order to determine whether development should be prevented (only in cases where there would be damage to a nationally important asset) or appropriate mitigation measures.

*Summary of assessment:* Little to comment on as the policy ensures adequate opportunity to assess the potential importance of sites and to provide for inspection. We assume that practical controls and the timing of inspection (and removal of materials if necessary) would be coordinated through the EIA for the development.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### **CH/3 – Listed buildings**

Proposes that development affecting listed buildings would only be permitted if it helps to preserve or appropriately enhance the structure. The policy also provides contingency for situations in which partial or total demolition of a listed structure is proposed, requiring a clear case for its loss, assessment of its value, and the need to preserve a documentary record and any materials.

*Summary of assessment:* As for CH/2 this policy ensures priority is given to preserving and (where possible) enhancing heritage assets. The policy and supporting text also provide for extension or conversion of use provided this is consistent with the fabric of the building, and in extreme cases for demolition.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### **CH/4 – Development within the curtilage or setting of a listed building**

Establishes that planning permission will not be granted for development that would adversely affect its setting.

*Summary of assessment:* Supports CH/3 in preventing inappropriate changes to the setting of listed properties, which would have particular benefits for individual listed properties within settlements and in locations that are not afforded protection through conservation area status.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### **CH/5 – Conservation areas**

Prohibits development that has an overall adverse impact on a conservation area, although development that enhances it would be permitted in principle, subject to scrutiny of the proposal.

*Summary of assessment:* Clearly sustainable in terms of its effect on preserving the character and setting of areas within existing settlements. The constraints on redevelopment mean that even small improvements to reduce, for example, heat loss are impractical and this may imply a marginal impact on the quality of the dwelling, but this must be weighed against the need to preserve the setting of these areas.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### **CH/6 – Protected village amenity areas**

Prohibits development that would adversely affect pre-defined areas within a wide range of villages.

*Summary of assessment:* Another sustainable policy which extends the principles of conservation area preservation to a wider range of locations. This policy also intrinsically supports the settlement hierarchy defined in policies ST/2 to ST/5, providing an additional constraint on inappropriate development.

*Summary of mitigation proposals:* The supporting text does not indicate where PVAAs are defined (presumably in the village framework); detail of where to find information on designated areas and structures is provided for other CH/ policies.

*Secondary, cumulative or synergistic effects:* None identified.

### **CH/7 – Important countryside frontages**

Protects areas of countryside that partially penetrate settlements, effectively providing a localised green corridor.

*Summary of assessment:* Supports other policies designed to preserve and enhance the unique character of parts of the district.

*Summary of mitigation proposals:* It would be helpful to give more specific examples of these features if possible.

*Secondary, cumulative or synergistic effects:* None identified.

### **CH/8 – Advertisements**

Establishes broad principles that restrict the size and impact of advertisements.

*Summary of assessment:* The policy provides overall control to prevent unwarranted intrusion by advertising hoardings, canopies and similar facilities regardless of location, but with specific controls on their impact in areas covered by conservation and other designations.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

### **CH/9 – Shop fronts**

Ensures changes or extensions to shop fronts are not obtrusive and in keeping with local character.

*Summary of assessment:* Implements appropriate controls to protect the visual character of most urban settings from obtrusive redevelopment, however localised this may be. This policy and CH/8 do not prevent development, only constraining that which is inappropriate, and therefore it would be wrong to assume this has a small incremental impact on the local economy.

*Summary of mitigation proposals:* None.  
*Secondary, cumulative or synergistic effects:* None identified.

## 4.10 TRAVEL POLICIES

### ***TR/1 – Planning for more sustainable travel***

Proposes that new development will only be permitted in locations that are readily accessible or will attain accessibility by a range of transport modes that encourage reduced use of cars. The policy also provides for broad linkages between the Local Transport Plan and LDF policies, and the coordination of policies on car parking with those that encourage cycling and walking.

*Summary of assessment:* Proposes spatial policies for locating new development in the most accessible locations that is consistent with the broader strategic policies on housing and development in general stated in ST/1 and ST/2, and that is also consistent with current planning guidance in PPS1 and PPG13.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* The main issue is that this and other policies focus development towards generally the same locations – readily accessible central sites in the main Rural Centres in the district. This will clearly contribute to development pressure though the impact of this is difficult to judge at this stage. Nevertheless it suggests some principles may need to be defined to help determine whether a particular suitable site close to the centre of one of the district's main settlements is best developed for housing (presumably with affordable housing provision), for employment, or for other amenities.

### ***TR/2 – Car and cycle parking standards***

Proposes provisioning levels for car and cycle parking that are set out in separate annexes, the former detailed extensively for a wide range of Use Classes. The policy also states the intention to adopt more stringent standards for new development at sites that are well-served by public transport.

*Summary of assessment:* The policy proposes car and cycling parking / provisioning standards that are consistent with those in PPG3 and PPG13. However those are national standards that apply generally as a target in support of sustainable transport policy, and it will be important to ensure that parking provision still meets local requirements. In particular, as the county is predominantly rural, many people will continue to rely on their cars to visit shops, amenities, etc. in the short-term, and it may be necessary to monitor the effect of these standards to ensure they are not counter-productive, discouraging people from visiting rural centres because of perceived parking difficulties. This concern applies also to parking at employment sites but is perhaps less important.

*Summary of mitigation proposals:* Ensure monitoring plan evaluates impact – this would probably have to be achieved through surveys of shoppers, commuters and residents.

*Secondary, cumulative or synergistic effects:* Principal issue is addressed in the summary above.

### ***TR/3 – Mitigating travel impact***

Requires developers to take measures to mitigate any predicted impact on travel patterns. Development likely to have significant transport impacts will need to be supported by a Transport Assessment and a Travel Plan as appropriate.

*Summary of assessment:* An essential policy to anticipate and where necessary mitigate the impact on the district's heavily used transport network (and particularly the road system) in advance of new development. It is particularly important to understand the transport impacts given the scale of new development that will occur across the district during the life of the plan, although parallel development in different areas may make the assessment of these effects more complex. Mitigation will be needed on a site-by-site basis and therefore directly proportional to trip generation and size of site, so this should be applied on an equitable basis to all scales of development.

*Summary of mitigation proposals:* Since the additional planning documents will take time and money to develop, should the policy set a size threshold below which the requirement is not mandatory so that those planning to develop smaller sites are not penalised?

*Secondary, cumulative or synergistic effects:* Principal synergistic impact should be beneficial because it not only prevents traffic problems in the locality of the development, but also more broadly across the district.

#### ***TR/4 – Cycling and walking provision***

Establishes the Council’s commitment to improving the provision of cycling infrastructure, secure parking facilities, etc. to encourage modal shift, and equivalent measures to encourage walking where this is currently impeded by concerns about crime and physical safety. The policy defines priorities as facilities for local commuting and shopping first, then safer routes to schools, then leisure activity.

*Summary of assessment:* Little to say other than this is another policy supporting sustainable transport objectives and integrating them with urban design both in new settlements, and also with existing infrastructure such as the National Cycle Network. We understand the broad definition of the first priority reflects the central location of schools as well as local employment, retail and amenities and therefore the policy supports a wide range of potential movement within a community and between adjacent ones.

*Summary of mitigation proposals:* Possibly make it clear that infrastructure should be designed to facilitate use by the less mobile – eg. access to footbridges by ramps rather than steps.

*Secondary, cumulative or synergistic effects:* None identified.

#### ***TR/5 – Rail freight***

Encourages development of freight interchange facilities at locations that meet the requirements of other plan policies.

*Summary of assessment:* Another policy on which there is little to add as there is a single north-south rail link capable of carrying large-scale freight movements, nevertheless its objectives are consistent with guidance in PPG13.<sup>2</sup>

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* Scale of rail infrastructure suggests there might only be scope for a single facility, though this could have some benefit if it can supplant HGV movements, but recognising that it would also focus them on a particular site.

#### ***TR/6 – Eastern Rapid Transit***

The policy states the Council’s intention to seek developer contributions for a rapid transit service linking the new urban extension at Cambridge East with the city centre.

*Summary of assessment:* The policy primarily seeks finance for transport infrastructure from developers, but the assessment highlights the broader benefits that the link would bring, and these are more likely to occur if financial contributions mean the project goes ahead.

<sup>2</sup> We are aware that there is a spur east from Cambridge to Newmarket, however this is single-track and assumed to be unsuitable for large rail shipments.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* Traffic congestion improvements may spread into other parts of the city. More importantly the link will support the establishment of the district centre at Cambridge East by making it readily accessible from the city centre.

### ***TR/7 – Aviation-related development proposals***

Proposes a range of development criteria and controls that would permit development or expansion of aviation-related activities (including those of small flying clubs) to limit environmental, landscape and transport impacts.

*Summary of assessment:* An overarching policy intended to place development controls on aviation-related developments over a potentially wide scale, ranging from larger airfields such as the current Cambridge airport, to small sites used by flying and gliding clubs.

*Summary of mitigation proposals:* None.

*Secondary, cumulative or synergistic effects:* None identified.

## 5 SUMMARY OF CUMULATIVE IMPACT ASSESSMENT

Current guidance on SA / SEA requires the consideration of impacts other than those directly related to application of the policy. These include secondary impacts (eg. would a new development result in lowering of the water table that would affect sensitive biodiversity assets?), and the synergistic and cumulative impacts that may occur as a result of the application of two or more policies.

Current guidance proposes a wide range of techniques for this part of the analysis, and good practice is still evolving in the transitional period when the new assessment regime is applied to plans emerging under the new planning structure.

Scott Wilson has undertaken an initial analysis of the effects mentioned above insofar as they are evident from the policies in the draft DPD. Summary comments on the cumulative effects across each area of policy are provided below. Further consideration will be given to effects between policy areas and reported as appropriate in the draft final Environmental Report.

### **Strategy**

The addition of the associated transport demands, infrastructure demands (doctors, police, fire services etc) will create a burden. The development policies controlling these developments need to be robust to ensure that sustainable communities in all sense of the phrase are created. The release of Green Belt from multiple sites will have a negative effect although in many locations it is compensated by re-designation to preserve the openness of the landscape and recreational space. Whilst there are constraints through policy, there will be nonetheless a negative cumulative impact of housing policy. As this is dictated by government policy and the adopted county Structure Plan, the Council's priority is to mitigate for the development that they are obliged to provide. Therefore, in terms of the 'business as usual' scenario, the effects of these policies will cumulatively be positive. The residual impacts will be the ones to assess.

### **Green Belt**

Disregarding development that is required through the planning hierarchy, this policy should result in positive cumulative effects. In combination with GB/2 should provide effective protection of the Green Belt, and where development does occur, despite a possible net loss in Green Belt which may be compensated by re-designation, the development should be appropriate to both the character and landscape of the area.

## **Development Principles**

These reinforce the Strategy policy through more specific requirements that development must satisfy. Whilst these policies may be beneficial for some areas, it is important that the restrictive tone of some terminology should not be a disincentive to development. Policy might include specific reference to sustainable design methodologies such as BREEAM, Ecohomes, CEEQUAL and SUDS although this could be detailed in supplementary planning guidance to be drafted subsequently.

## **Housing**

Has the potential, through densities, to lower average energy consumptions, reduce average travel times, and lower average water consumption, although some of these will grow in small increments as new development occurs. There will be a beneficial cumulative effect for rural communities by both allowing sympathetic development which contributes to vitality without sacrificing the character of the area.

## **Site specific allocations**

[Cumulative and other impacts still under review]

## **Economy & tourism**

The need to expand the sub-region's capabilities in this area to maintain its leading position need to be balanced against the demands it makes on supply of energy and water, and the waste materials that some research sectors produce.

Policies should not provide scope for 'salami-slicing' of development on sites. Depending on the type of land use, infilling may be on such a small scale that it falls below the threshold at which EIA is necessary, and issues such as traffic impacts may not be investigated.

Furthermore, there may be synergistic effects from improving the efficiency of use of land stock and the flexibility it might give in designing and integrating other components of the development (amenities, open space, etc.)

## **Services & facilities**

[Cumulative and other impacts still under review]

## **Natural environment**

Overall, the NE policies have no negative effects against the SA Framework. Cumulatively, it will be important to monitor the socio-economic effects of some robust environmental protection policies to ensure there are no long term negative effects either through

restriction on development or increased pressure on areas more likely to be developed (i.e. increased density, rise in property prices). However the scope to re-adjust is limited by statutory obligations to protect some areas, and the need to maintain the diverse character of the District, ranging from the north-eastern fenlands to the chalklands in the south.

### **Cultural heritage**

Cumulative effects broadly positive as a result of the positive nature of the policies assessed against the SA Framework. There may be negative effects on socio-economic factors resulting from the overly restrictive tone of the policy resulting in increased development pressure on areas meeting the criteria for development, and may serve as a disincentive to development in the area.

### **Travel**

The travel policies will have an overall beneficial cumulative effect. Policies follow PPG guidance, encourage the use of alternative transport and make provision for cyclists etc, however, due to the level of development and the possible influx of residents, there may be a net increase in energy consumed. However there is a potential synergy in development that attracts new residents to or from within the district and locates them in developments well served by travel choice, encouraging a modal shift rather than perpetuating their previous commuting patterns. As a result these policies together encourage a modal shift from cars and the promotion of walking and cycling to encourage healthier lifestyles. Car parking controls might be seen as a broad disincentive to relocate to the area, but those proposed are consistent with planning policy guidelines, and will be particularly important in new development ensuring it accommodates but is not dominated by private cars. Moreover the overarching effect of these policies in the longer term will contribute indirectly to the improved perception of the region as a good place to live and removing the blight of congestion.