

## 6. PLAN POLICIES

The predicted effects of each policy on the SA objectives are contained in detailed appraisal tables which are provided in a separate document due to their size, and which will be made available for consultation. This section draws together details from the Scoping Report – particularly the baseline – with the results of the assessments of overall and cumulative, and other impacts to summarise the overall social, environmental and economic effects of the plan, discussing them in the context of each SA objective in turn.

### 6.1 SUMMARY OF CUMULATIVE, SYNERGISTIC AND SECONDARY IMPACTS

Current guidance requires the explicit review of these three types of effect in order that each policy is not assessed in isolation. Guidance proposes a range of assessment techniques, each of which has merits and drawbacks. We have used a matrix-based assessment in this instance as it provides a clearer correlation between policies and objectives than some of the other techniques, although clearly it is a subjective element of the assessment.

Appendix 3 contains a table cross-referencing the SA objectives against the policies and the conclusions are summarised in a table outlining the principal impacts. In summary, the principal effects identified summarised in Table 8.

### 6.2 SIGNIFICANT SOCIAL, ENVIRONMENTAL AND ECONOMIC EFFECTS OF THE PREFERRED POLICIES

This section summarises the principal conclusions from the policy assessments, and combines this information with background from the Scoping Report, and additional information on the potential significance (positive or negative) of policy impacts where this can be determined.

The overall picture that emerges is of a strongly interlocked set of policies covering the principal issues defined in the Scoping Report alongside others which are necessary for the Council to meet its obligations as a Local Planning Authority. The detailed policy assessments only show strong consistently negative impacts on resource use and waste, these being inevitable absolute impacts of new development. Their impacts are mitigated by corresponding policies which apply to all new development, and their relative impact must be considered neutral given the need to increase housing provision to support the sub-regional economy and redress recent imbalances in housing supply and demand.

In the rest of this section we review the extent to which the collective set of policies support the objectives in the SA Framework. Each section follows a common structure, presenting the issue that the objective seeks to address, supported by baseline data where appropriate. The impact of the plan is then discussed and the key policies which are predicted to have positive or negative impacts are identified. The section concludes with a discussion of synergistic, cumulative or secondary effects where appropriate.

In reviewing these summaries reference should be made to the distinction between important and significant impacts which is discussed in section 3.1 of this report. Appendix 4 contains a table summarising the significant beneficial and adverse impacts identified from the detailed assessment of the effects of this draft DPD.

All data defining conditions in the District are taken from the baseline dataset unless otherwise stated.

### 1.1 Minimise the irreversible loss of undeveloped land and productive agricultural holdings

The shortage of previously developed land in the District is reflected in the target that 37% of new dwellings should be built on brownfield sites, a rate barely half the national target of 60% stipulated by ODPM, but which is established in the adopted Structure Plan. In 2003 the rate was 27%, consistent with that over the preceding five years, and suggesting the need for improvement. Much of this will be delivered by developments at Northstowe and Cambridge East, both of which are largely on brownfield land, but this does not obviate the need to identify, and allocate or safeguard other sites to maintain supply. Over the same period average housing density was 19.7 dwellings/ha., which is typical of the sub-region as a whole, but some way below the minimum threshold of 30/ha. specified in PPG3.

There is a clear theme across the policies to maximise effective use of brownfield land, and which is integrated through the settlement hierarchy (policies ST/1 and ST/3 in particular) and supported by the retail hierarchy. About half of the housing and employment allocations in policies SP/1, SP/4 and SP/5 use brownfield land, while the remainder use land that is either in productive use (possibly as allotments) or lying fallow. The SP policies listed below indicate the number of substantial allocations (in terms of area) which make effective use of brownfield land.

This objective is supported by policy HG/1 which requires housing densities consistent with guidance in PPG3, and with provision for higher densities in more central locations. Assessment of individual housing allocations reveals an issue of how these higher densities can be accommodated within older settlements which often have a more dispersed pattern of housing. This issue will have to be addressed in the development brief for individual allocations, although provision is already made to relax density targets in certain sites where there are particular problems of integrating new development into its setting.

Housing allocations are based on an assessment of the relative sustainability of the individual Rural Centres and other settlements which was undertaken for the Structure Plan and carried forward into the adopted Local Plan. If it is accepted that further development is necessary to expand the District's housing stock and to facilitate growth of the sub-regional economy, then these sites are the most sustainable, provided their absolute impact on use of energy, water, materials, etc. is overlooked.

**Table 8: Summary of issues arising from assessment of cumulative and other effects.**

General policy area	Summary comments
<b>Strategy</b>	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 senses are created. In the short term, the release of green belt from multiple sites will have a negative effect. Whilst there are constraints through policy, there will be nonetheless a negative cumulative impact of housing policy. This by and large is dictated through the government hierarchy so fundamentally, the Council can only try 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.
<b>Development Principles</b>	Development Principles policies reinforce Strategy policy through more specific requirements for development to achieve. Whilst these policies may be beneficial for some areas, the overly restrictive tone of some terminology may prove a disincentive to investment and may increase the pressure on other, available land. Furthermore, it is recommended that the policy include specific reference to sustainable design methodologies such as BREEAM, Ecohomes, etc.
<b>Green Belt</b>	Disregarding development that is required through the planning hierarchy, this policy should result in positive cumulative effects, however, as with other policies there may be a net adverse effect due to the major development proposals. In combination with policy GB/2 should provide effective protection of the green belt, and where development does occur, despite a possible net loss in greenbelt, the development should be appropriate to both the character and landscape of the area.
<b>Housing</b>	Has the potential, through densities, to lower average energy consumptions, reduce travel times, and lower average water consumption. There will be a beneficial cumulative effect for rural communities by both allowing development but maintaining the character of the area. There may be net adverse effects for SA Objectives 1.2 and 1.3 through the provision of development.

General policy area	Summary comments
<b>Site Specific Policies</b>	The cumulative effects of this group of policies results from the piecemeal land-take that results from development occurring within these designated areas. The proposed developments may, in isolation cause negligible effects, the repeated allocating of small sites will result in growing pressure inside the Village Frameworks. This will result in the corresponding land-take and associated pressures on the surrounding land to absorb the possible expansion of the existing Village Frameworks. Insofar as mitigation is concerned, there is limited scope. This is due to the development pressure through UK Policy and an expanding population.
<b>Services and Facilities</b>	Overall, the SF policies are positive, and 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 thorough restriction on development or increased pressure on areas more likely to be developed (i.e. increased density, rise in property prices).
<b>Economy and Tourism</b>	The need to expand the sub-region's capabilities in this area to maintain it's 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.).
<b>Natural Environment</b>	Overall, the NE policies are positive and 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 thorough restriction on development or increased pressure on areas more likely to be developed (i.e. increased density, rise in property prices).
<b>Cultural Heritage</b>	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.

General policy area	Summary comments
<b>Travel</b>	<p>Travel policies will have a overall beneficial cumulative (ie. synergistic) effect. Policies conform to PPG advice, 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. Policy should reduce the average per capita energy consumption (this should ideally be monitored). These policies together encourage a modal shift from cars. The overall promotion of walking and cycling may encourage healthier journeys. Thematically they aim to reduce reliance on the private motorcar and into alternative, more sustainable environmentally forms of transport. Additionally, although the car parking policy adheres to PPG 3, policy indicates that car parking provision should still meet local demand. Key areas of possible adverse cumulative effects could be in the reduction of competitiveness of the areas due to overly constraining policies on car users. The mitigation required therefore needs to be appropriate to the specific development proposed.</p>

Policies with a potentially significant or important beneficial impact: ST/1, ST/3, GB/2, DP/1, DP/7, DP/8, HG/1, 7 housing allocations in SP/1, SP/3, SP/10, SP/11, SP/15, SP/16, SP/18, SP/19, ET/4, ET/5, ET/6, SF/3, SF/4, NE/21, CH/1, CH/6, CH/7, TR/1. The absolute significance of these policies cannot be estimated because they establish strategies for or controls on development that will encourage use of the available stock of brownfield land, however their impact depends on the size, location and timing of development which cannot be assessed accurately at this stage. Any potential adverse impacts on greenfield land have been addressed already by the village survey which has nominated the most sustainable sites.

Policies with a potentially significant or important harmful impact: DP/4, SP/1m, SP/1t and SP/13. The negative impact of DP/4 reflects the absolute impact of development pressures on land use across the District, however its effect is mitigated by the other policies listed previously which prioritise brownfield land use and prevent loss of greenfield land. Two housing allocations appear to take areas of open, undeveloped land but have been saved from the adopted Local Plan and are therefore assumed to be more sustainable than development elsewhere. SP/13 concerns road improvements, including two bypasses, which will take or cut through open land and for which the impact of land take must be balanced against benefits of reduced traffic congestion, and improvements to air quality and public safety.

The principal cumulative effect relevant to this objective is whether there is an adequate supply of brownfield land in the longer term, once the large allocations at Northstowe and Cambridge East are being developed. For example, planning permission has been granted already for half the housing allocation sites in policy SP/1 and most of the remainder are small plots of less than 2ha.

However a broader issue is the longer-term impact of directing all forms of development towards the same centres. While this policy (the cumulative impact of ST/1, DP/1, ET/5 and SF/3) is consistent with policy in PPS1 it suggests competition for the available land which may drive up prices, limiting its use for some form of development (eg. affordable housing). Sequential tests provide a mechanism for enabling development of sites in less sustainable locations once the stock of brownfield land is exhausted, however it is not clear at present when that point might be reached.

### 1.2 Reduce the use of non-renewable resources, including energy sources

Prudent use of natural resources in general is one of the basic themes of the UK sustainable development agenda. Baseline data suggests local consumption of gas is lower than the UK average, at 15395KwH per home, compared to 17000KwH for the UK as a whole. Nevertheless, climate change concerns mean a need to control consumption or exploit more sustainable power sources.

Current targets require a 10% increase in production of renewable energy, although the District's capacity has remained static at just under 9GwH for the last five years. There is a regional target to generate 14% of electricity needs from renewable sources over the same period. At present there is no other information to assess the District's performance and an additional

indicator might measure the number of new developments where recycling of building materials occurred in line with policy DP/2.

Introduction of energy efficient technology and renewable energy generation are addressed by a number of generic development policies in the Natural Environment policies, the most important of which establish quotas or thresholds which developers must achieve for the installing photovoltaic cells, solar panels and heat-retention measures. The targets are not particularly stringent, however the Council considers this the most effective way of providing flexibility in that this is expected to encourage developers to meet these thresholds.

Many of the strongly positive assessments reflect the impact of sustainable transport policies and others (such as those promoting mixed land use in central locations) which will contribute to reduced private car use and the consumption of non-renewable fuels.

Policies with a potentially significant beneficial impact: ST/3, DP/1, DP/6, SP/2, SP/14, NE/1, NE/2, NE/3, TR/1, TR/3 and TR/4. All policies have the potential to contribute to improved energy efficiency, but their individual and collective impact cannot be estimated at this stage. Similarly, policies for sustainable travel will contribute but their impact depends also on the success of the measures at shifting people from cars to other forms of transport.

Policies with a potentially significant adverse impact: ST/1, DP/4, HG/1, 12 housing allocations in SP/1, SP/18, ET/1, ET/3. All the above represent a negative impact only in absolute terms as a result of the demand of new development for building materials, aggregates for roads, energy, etc. Moreover the significance of the housing allocations is possibly overstated insofar as their impact is negligible alongside that of the developments at Cambridge East and Northstowe.

The main issue for this objective is the limited cumulative benefit. Developers are required to achieve quotas on energy efficient and renewable energy technology in new sites but, in spite of the large growth of housing in the District, this will not address the potentially poor thermal efficiency or lack of new technology in much of the remaining housing stock. Therefore the impact of these measures appears incremental at best.

### 1.3 Limit water consumption to levels supportable by natural processes and storage systems

The District lies in one of the driest areas of the UK (Scoping Report, para. 8.3), although it benefits from the chalk geology in its southern half, as a result of which measures to maintain the openness of land (for percolation) and maintain the nature structure of drainage systems are essential. Unfortunately evaluation of current conditions is limited by the lack of sustainable indicator information at present, although the Scoping Report notes this is a priority for which a source of data is being investigated. (Note that water quality issues are addressed by objective 4.1).

Water consumption is addressed primarily through policy NE/15, with NE/13 contributing by minimising the impacts of development on runoff. The Scoping Report also notes the need to encourage residents and business to



participate in water economisation measures, however this is not addressed specifically in the current plan policies. Leakage rates are also identified although this is the responsibility of the water companies.

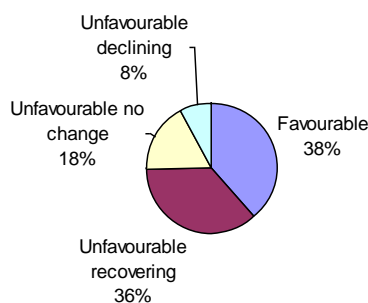
Policies with a potentially significant beneficial impact: DP/1, NE/11, NE/13, NE/15. All policies clearly support maintenance of water quality, resources and run-off rates, although their general nature means that their impact cannot be calibrated.

Policies with a potentially significant adverse impact: ST/1, DP/4, HG/1, 12 housing allocations in SP/1, SP/2, SP/18, ET/1, ET/3. The assessment for this objective largely mirrors that of 1.2 above. In absolute terms the wide-ranging development proposed by the broader LDF is unsustainable due to its potentially significant increase in water consumption, and notwithstanding the adequacy of current supplies as noted in the Scoping Report. The beneficial policies therefore provide a mitigating effect which applies primarily to new development. As with energy consumption, this raises the issue that such benefits will be incremental and quite difficult to detect since they will only be delivered on new sites and not retro-fitted to existing housing, industrial and service / amenity sites.

## 2.1 Avoid damage to designated sites and protected species

Biodiversity assets and the impact of a plan on them are one of the most difficult policy areas to calibrate. The District contains 39 SSSIs and there is a single cSAC at Eversden Woods. There are several dozen County Wildlife Sites, as well as patches of lowland grazing marsh scattered along the Cam and its tributaries, and along the Great Ouse at the far north of the District, as well as small patches of ancient semi-natural and replanted woodland in the east close to Newmarket.

**Figure 1: Condition of SSSIs in South Cambridgeshire (Source: English Nature, 2005).**



The most recent survey of the condition of SSSIs (see Figure 1) shows 74% of those in the District are in favourable or unfavourable recovering condition, compared to a UK figure of 66%. The only comparator is a figure of 68% for all Cambridgeshire and Peterborough SSSIs in 2004. This objective concerns designated sites which are already afforded strong protection by the Habitats and Birds Directives, Countryside and Wildlife Act and PPG9, and is reinforced by policies NE/6 and NE/7 which apply specifically to designations.

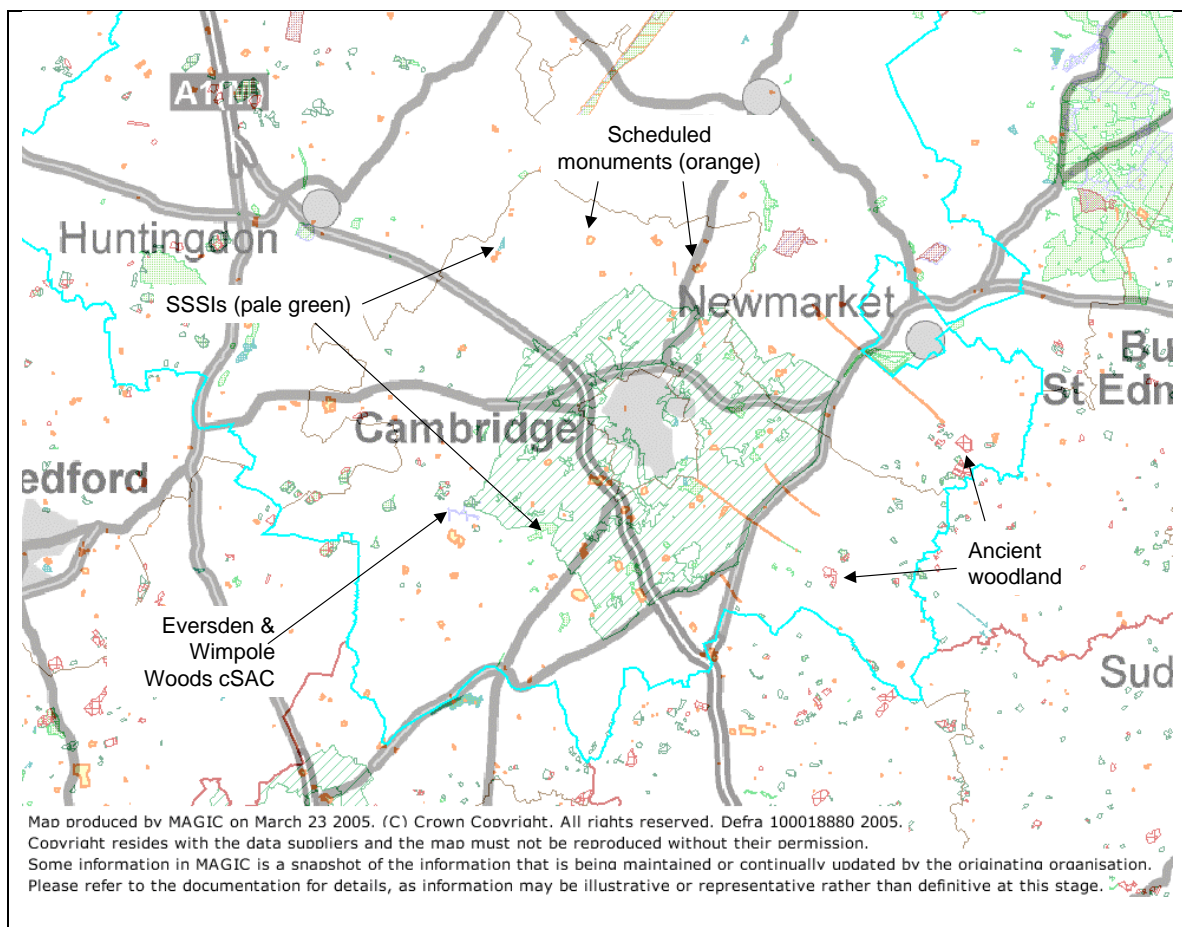
Figure 2 overleaf identifies the location and extent of the principal conservation designations in the district.

Other policies in the draft plan afford protection although they are more concerned with broader biodiversity, and these are reviewed below.



Policies with a potentially significant beneficial impact: SF/9, NE/6, NE/7, NE/8, CH/7. These are primarily preventative policies which are designed to avoid impact on designated sites. Other policies such as DP/2, NE/11 and NE/12 provide controls on activities that could have adverse impacts on nearby designated sites, although the detailed enforcement needs to be implemented through a development brief and criteria, and by the need for EIA where appropriate.

**Figure 2: Condition of principal landscape and conservation designations in South Cambridgeshire (Source: DEFRA - MAGIC, 2005; map © Crown copyright).**



None of the policies has a clear adverse impact on a designated site, although two (SP/1t and SP/11) concern development on the east side of Papworth Everard on land adjacent to a SSSI. These issues will need to be accommodated in the development brief but point to possible adverse impacts which suggest use of these sites should only occur provided there is suitable mitigation, thorough investigation of potential impacts (especially on air quality), and an overriding need for development.

There are no specific cumulative or synergistic issues for this objective; and the main secondary impact is the possibility of air and water impacts on sensitive sites as a result of extensive and/or inappropriate development. Several housing allocations are within the vicinity of protected sites (ie. at

least 1.5kms away) other than those mentioned above, and none appears to be upstream, creating a risk of water contamination during construction.

## 2.2 Maintain and enhance the range and viability of characteristic habitats and species

The biodiversity value of the Cambridgeshire countryside is a key component of the District Vision (see Section 2.2). The SSSIs mentioned above cover an area of 954ha; the area of County Wildlife Sites is not available but is assumed to be greater than this. However the Scoping Report states that this represents a relatively low level of formally protected wildlife area given the District's rural extent. The Scoping Report refers to software under development that can estimate the extent to which Biodiversity Action Plan targets and objectives are being achieved. This facility is not available at present, a common problem for councils in our experience. Other indicators such as the trends in farmland and woodland bird populations are not available at local level, but might show significant trends that need to be addressed, given the intensity of the agriculture in the District, especially the north-east.

The Cambridgeshire Biodiversity Action Plan identifies five broad habitats (including acid grasslands and rivers & streams) and a further ten priority habitats (including ancient and/or species-rich hedgerows, cereal field margins, coastal and floodplain grazing marsh, fens, lowland calcareous grassland, lowland meadows and reedbeds). Some of these will be present in each of the areas covered by DPDs in the initial South Cambridgeshire LDF, and action plans have been prepared for each habitat. A further twelve local habitats (including churchyards and cemeteries, roadside verges, drainage ditches and arable land) have been identified.

The plan currently contains a range of biodiversity protection measures that extend the rigid controls required for nationally important sites down to those of District importance. This hierarchy is evident in policies NE/4 and NE/6 to NE/8, which are based on different landscape designations, and which directly contribute to this objective because the Strategic Vision makes explicit links between landscape character and important biodiversity assets such as trees and hedgerows. A broader theme of appropriate protectionism is evident throughout the rest of the plan, with policies that facilitate development also including criteria to prevent biodiversity impacts.

Other policies, such as ST/3 also facilitate development within settlements but include controls to prevent excessive infilling, especially of green corridors.

Policies with potentially significant beneficial impacts: ST/3, GB/7, SF/9, NE6, NE/7, NE/8, NE/15. The scope of most of these policies is primarily preventative and therefore their individual and collective impact can only be assessed in relation to development proposals. None of the site specific allocations suggested important biodiversity impacts, although a number of the largest developments are on currently open land, and development should not truncate or should mitigate biodiversity features. We would expect this issue to be addressed in development briefs for the sites.

Apart from the localised examples identified above, none of the policies is considered to have significant adverse biodiversity impacts, provided good design and the provisions of policies SF/11 to SF/13 contribute to the stock of open land within settlements which can still support wildlife.

However the cumulative impact assessment identifies a possible issue in terms of the impact of these policies on developers' interest in the District. While the overall tenor of the plan facilitates development, there are many policies that impose a variety of development constraints and that could be a disincentive, even if the Council welcomes appropriate development.

### 2.3 Improve opportunities for people to access and appreciate wildlife and wild places

This objective is not directly related to specific government policies or targets, although there is a strong fit with the objectives of the Countryside and Rights of Way Act 2000 (CRoW), and with initiatives to promote healthier lifestyles. The corollary of this last point is that care needs to be taken in opening country areas for quiet enjoyment, and the promotion of sites that it is feasible for most people to reach only by car. The baseline dataset has no information on relevant parameters (notably the % of rights of way that are open and in reasonable condition) and we expect this will be addressed by the obligation to measure their availability arising from CRoW.

Nevertheless the plan contains two policies – GB/6 and GB/7 – that directly affect the provision of recreational space and tranquil countryside areas which would lie in the Green Belt and within ready access on cycle, foot or public transport. As with objective 2.2, the interlocked nature of the plan's policies mean that these objectives are supported by a range of preventative measures to ensure development within the countryside, and at the sensitive urban/rural boundary is does not affect biodiversity. Moreover GB/7 is particularly important as it clearly addresses the need for improvement and continual management of these assets by the Council and voluntary bodies, and its objectives are indirectly supported by the objectives of policy NE/5.

Policies that have potentially significant benefits: GB/6, GB/7, ET/11, NE/5. Overall significance and benefit cannot be judged at this stage without details of the number and location of specific developments.

There are no policies that conflict with this objective, and any concerns about the broader implications of development on biodiversity in general (places and species) are covered by the comments for 2.2 above.

There is a clear, potential long-term secondary effect of development pressure on the demand for land around Cambridge and the larger settlements, which will grow as the stock of brownfield land is exhausted. The underlying aim of this policy is to preserve tranquil areas within easy reach of settlements of all sizes, and therefore other policies that control development at the urban periphery must be enforced, their effectiveness monitored, and their scope widened if it is clear they are not offering appropriate protection.

### 3.1 Avoid areas and sites designated for their historic interest, and protect their settings

This objective can be difficult to measure because assets are widely fragmented, and their presence only suspected. The age of many settlements in the District means a high level of listed buildings, but there is a much broader significance because of the rural settlement pattern and the shared heritage with Cambridge city. The Scoping Report notes there are more than 2600 Listed buildings, more than 100 Scheduled Ancient Monuments, and 80 conservation areas, with a preponderance of structures using locally distinctive materials which adds to settlement character.

The Scoping Report notes that the principal indicator - % of listed buildings considered at risk - has remained roughly static at around 2%.

Notwithstanding the above, the plan policies provide extensive protection for individual buildings as well as their setting. Policies CH/1 to CH/3 provide the most direct protection for specific types of asset, and are supplemented by a very wide range of development criteria in the detailed print in other policies.

Policies with a potentially significant beneficial impact: SP/1u, SP/6, SP/11, SF/9, CH/1, CH/2, CH/3, CH/4, CH/5. At present the impact of many of these supportive policies cannot be judged as significant without knowing the level of development they would be expected to control, therefore the number of supportive policies is greater than shown below. For example policies on urban design and control of advertisements and other urban infrastructure can help to preserve the setting of sites and conservation areas.

A small number of site-specific policies are considered to have potentially important negative impacts which will need further assessment. Developments in Fowlmere and Oakington are planned for locations where there are known to be Medieval artefacts or structures. The significance of these structures cannot be judged with the information available at this stage, however their physical size precludes removal and it is not clear whether they would survive re-development or could be integrated into it. This mitigation approach is proposed for other villages where some archaeological remnants are believed to exist. This consideration will need to be made clear in the development brief for the allocation (it is mentioned in the Local Plan but not in the current DPD text), and evaluation undertaken separately or as part of an EIA.

The principal cumulative impact is the indirect contribution of these widespread designations on development options. Most of the assessment of housing allocations in SP/1 refer to the need for sensitive integration of new properties, but many of these allocations occupy what little remaining developable land lies within the settlements. This will presumably contribute to development pressures elsewhere.

### 3.2 Maintain and enhance the diversity and distinctiveness of landscape and townscape character

The Strategic Vision (section 2.1) sets great stock in the importance of the District's character to its attractiveness as a place to live and work (notwithstanding the costs involved), and as a complement to the principal

tourist attraction of Cambridge itself. The Scoping Report notes that in 2004 more than 21% of the built-up area of the District lay within a conservation area (although it also comments that redesignation may result in a reduction in this area). Other than this parameter it is difficult to identify meaningful indicators that can be measured readily and at an appropriate scale for the built environment. However this is largely subsumed by the designation of Landscape Character Areas which reflect the integration of settlement pattern and density, building materials, flatness of the terrain, along with more subtle nuances such as the importance of the openness of the East Anglian Chalk to recharging the District's groundwater resources.

Unsurprisingly, a plan with a large number of development control policies covers this objective thoroughly. The overarching strategic, development and housing policies are supported by the 'fine print' of development controls in urban and rural areas, for housing, employment and other specific uses.

Policies with potentially significant beneficial impacts: ST/4, ST/5, ST/6, GB/2, GB/3, GB/4, GB/6, GB/7, DP/4, DP/1, DP/2, DP/5, DP/7, DP/8, HG/1, HG/2, SP/8, SP/11, SP/19, SF/2, SF/3, SF/4, SF/6, SF/8, SF/11, SF/12, SF/13, NE/4, NE/15, CH/1, CH/3, CH/4, CH/5, CH/6, CH/7, TR/1. This list may overestimate the impact of individual policies at specific sites, but the extent and interlocking nature of these policies indicates they form a comprehensive safety net, which supports the objective of preventing inappropriate development without precluding it.

Three specific housing allocations are identified as having potentially adverse impacts – Fowlmere, Longstanton, Papworth Everard SP/1t. The former reflects the impact of placing higher density housing in a well spread-out traditional settlement, and will need very careful design to achieve this. Development at Longstanton will place housing in an open area (although this will be adjacent to a planned) parkland-style research campus) and will again require careful landscaping in an already likely to be affected by the development of Northstowe. The main issue for Papworth Everard is the ability to retain the parkland setting of heritage assets in the light of extensive redevelopment of the use of the site, if not some of the buildings. Proximity to an SSSI is a further concern (see objective 2.1).

Clearly the range of policies affords a high degree of control preventing cumulative (adverse) impacts, although the scale of deployment elsewhere suggests it might be difficult to claim there are positive synergistic impacts as these are unlikely to result from preventative policies. The principal secondary impacts may be as for objective 3.1: focusing development pressures on specific locations (affecting land prices), and giving the impression that there are limited opportunities for development, even if this is not the case.

### 3.3 Create spaces, places and buildings that work well, wear well and look good

This objective is one of the most difficult to assess as it is largely subjective. Good urban design principles address requirements in settlements, and this is assumed to be the focus of the objective. The need for good quality landscape is assumed to be addressed by objectives 2.2 and 3.2.



A 2002/3 survey suggests South Cambridgeshire is performing well, with 90% of residents satisfied with the quality of their immediate (built) environment, which is above the national average. This outcome appears to reflect the predominantly rural aspect of the area, and the open, low density layouts of many of the District's principal settlements. However the same survey mentioned above showed a third of residents were concerned about deterioration of their local environment. Unfortunately the Scoping Report (baseline and narrative) do not indicate which factors are behind this trend, and potential candidates may include the inability to move due to house prices, rural crime, the perceived 'threat' of new housing, or other factors.

For these reasons we have not been able to distinguish policies that address this objective individually, as achieving it is intrinsically linked to 3.2. The comments for that objective apply to this one equally. However there is one exception – policy SF/3 (and supported by other SF/ policies) – establishes the retail hierarchy that is consistent with the settlement hierarchy in the ST policies. Their combined objective is to strengthen the coherence of settlements in proportion to their current facilities, accessibility and estimated carrying capacity. While also indirectly supporting policies on sustainable transport and healthy lifestyles, the objective of these policies is to ensure new development is encouraged at those locations where it can make the most positive contribution to settlement life, and to the greatest number.

Clearly this means the policies also indirectly support objective 6.2.

Policies with potentially significant beneficial impacts: ST/4, ST/5, ST/6, GB/6, DP/4, DP/1, DP/2, DP/5, HG/1, HG/2, SP/8, SP/11, SF/2, SF/6, SF/11, SF/12, SF/13, NE/4, NE/15, CH/3, CH/4, CH/5, CH/6, CH/7, TR/1.

The only policy with potentially significant adverse impacts is ST/1 insofar as it adds to development pressure and house building needs can only be integrated with sustainability requirements by increasing densities and using some of the remaining open space that may contribute to residents' high regard for their local environment.



#### 4.1 Reduce emissions of greenhouse gases and other pollutants (including air, water, soil, noise, vibration and light

Section 11 of the Scoping Report highlights several issues under this objective where local conditions are below national averages, or where performance has deteriorated recently. Commuting patterns (including the school run) are a particular issue, which contribute to local congestion to add to the 28% increase in vehicle traffic over the period 1992-2002. Local monitoring has shown that traffic flows into and out of Cambridge are static but above the level stipulated in the Local Transport Plan. A further indication of the nature of the problem is that trunk traffic flows are 70% above the national average, and that on other principle roads is 35% higher. This situation has implications for air quality with recent data suggesting a significant deterioration with a 30% increase in NO<sub>2</sub> levels at one local monitoring station alongside the Cambridge-Huntingdon link of the A14, while at another station on the Cambridge Northern Fringe levels were static but already 30% above UK and European thresholds. Furthermore, dust concentration may be an issue. Two measurement stations providing local data show concentrations of 40 and 72µg/m<sup>3</sup> respectively, the first equaling the air quality threshold for this parameter, and the second being almost double. However from 2005 the dust concentration threshold is cut to 20 µg/m<sup>3</sup> (to be achieved by 2010) suggesting a potential air quality problem if these levels are typical of other parts of the District.

Water quality does not appear to be a problem with all main rivers achieving 100% rating on biological and chemical quality, a significant improvement on the situation five years and well above the national target of 95% by 2005. The quality of smaller water courses is not known.

The Plan addresses these issues primarily through policies on sustainable transport and also through the settlement hierarchy, which concentrates new development in the larger centres in order to reduce the distance between home, work and services, and to increase the possibility that residents in new housing can find employment locally. The provision of the Rapid Transit links (policies SP/14 and TR/6) are also integral to the policy of attempting to shift people onto public transport, while policy TR/4 prioritises provision of cycleways to reduce school run traffic, although this will need to be supported by other initiatives to ensure these routes are safe.

Policies with a potentially significant beneficial impact: ST/3, 3 housing allocations in SP/1, SP/2, SP/3, SP/11, SP/14, SF/2, SF/3, SF/6, NE/1, NE/2, NE/3, NE/10, NE/12, NE/17, NE/18, NE/19, NE/20, TR/1, TR/2, TR/3, TR/4, TR/6, TR/7. These policies fall into two groups: those that determine the location of new development, directing it to the most sustainable locations – which in this case means those which are likely to be the most accessible and best-served by public transport; and those that provide broad controls on development which will apply in parallel with other policies to ensure development does not contribute to dust levels, surface water contamination, light spill, etc. In the light of comments at the start of this section, policies DP/34 and NE/19 will be particularly important in limiting the contribution of construction activity to the existing dust problem.

At present the significance of the impact of these policies cannot be calibrated as this will depend on the design brief and timing of new development.

Policies with potentially significant adverse impacts: ST/1, one housing allocation in SP/1, SP/13. ST/1 reflects the concerns above about the impact of the scale of new development in the District on dust generation in particular. The single housing allocation concerns Papworth Everard and the potential impact of development on the south-east side of the village on the neighbouring SSSI. SP/13 provides for three road improvements which will improve traffic flows at known bottlenecks. This represents a dilemma since two of the improvements will cut traffic in village centers, improving local air quality, however they will also help to improve the ease of commuting and may be seen as somewhat counter-productive.

The principal potential cumulative impact has been referred to already and is the impact of parallel development of several major sites on air quality, in terms of dust generation and emissions from construction traffic. Moreover it is important to recognize that some air quality problems result from traffic levels on the A14 which cannot be affected directly by the Plan, the dominance of Cambridge as the local employment center, and the dispersal of much employment growth into business parks at peripheral locations which are not necessarily well served by convenient public transport.

#### 4.2 Minimise waste production and support the recycling of waste products

The Scoping Report suggests this is another pressing problem for the District with a 25% increase in waste generation to 352kgs/household over the period 2001-2003. In 2003 just over 20% of this material was recycled and a further 5.3% was composted. While both represent good progress, the sizeable increase in waste generation creates extra pressure to meet the target for value recovery from 40% of waste by 2005. Also, it is not clear what level of landfilling of this material occurs at present as this statistic is usually given at county level.

It could be argued that the wider LDF does not support this objective. The addition of 8000 homes at Northstowe, 10000 to 12000 at Cambridge East, and 2000 at other sites would generate more than half a million tonnes of waste even if rates remain at current levels, adding considerably to the problems of achieving the improvement in recycling and reduction in landfilling required by Waste Strategy 2000.

Policies with a potentially significant beneficial impact: DP/6; NE/15. DP/6 is supportive in that it provides for recycling of demolition waste wherever this is practicable. While virtually all of the housing and employment land allocations are brownfield, the current land use is unlikely to generate these materials, limiting the impact of this policy.

Policies with a potentially significant adverse impact: ST/1, HG/1, 11 house allocations in SP/1, SP/2, SP/18, ET/1, ET/3. All policies have an adverse impact as they result in new growth of developed land, and therefore contribute to the problem of increase waste arisings mentioned above. Clustering of new housing and employment on single sites will help by making it easier to organise waste collection, but both will contribute to waste

growth and collection of industrial and commercial waste lies outside the Council's control.

The principal cumulative impact is the growth in waste arisings as a result of development on the scale envisaged. A potential secondary impact is the availability of suitable sites either for landfilling this material (recognising this method of dealing waste is to be significantly reduced over the next 10 years), or for treatment facilities such as MRFs, incinerators and composting plants. One potential issue is how such facilities could be integrated into the District landscape, however combustion in an Energy from Waste plant might contribute to reducing consumption of non-renewable fuels.

#### 4.3 Limit or reduce vulnerability to the effects of climate change (including flooding)

This objective addresses two areas: reducing the vulnerability to flooding, and improving the thermal efficiency of structures to retain heat thereby reducing energy demands. Both parameters are difficult to calibrate at present, although the Scoping Report proposes to use GIS of Environment Agency data to determine the number of properties currently lying within moderate to high (100 to 50 year incidence) areas.

The Plan clearly addresses both issues with specific policies. NE/13 precludes development in the floodplain unless appropriate protection measures are provided, although the policy has a broader impact in preventing development that may contribute to flood risk locally or elsewhere by interfering with run-off patterns. NE/1 provides for energy efficient design and is supported by NE/3 which establishes development criteria to encourage use of energy efficient technology.

Policies with potentially significant beneficial impacts: NE/1, NE/3, NE/13, NE/14.

Policies with potentially significant adverse impacts: none identified.

Both sets of policies support this objective but will apply only to new development. Other initiatives will be necessary to encourage increased use of energy-efficient solutions in existing housing stock, and to identify and protect those structures that currently lie in flood risk areas.

#### 5.1 Maintain and enhance human health

Data presented in the Scoping Report suggests this is not a particular problem for the District, with life expectancy above the national average (79 years for men, 83 for women, compared to national averages of 76 and 81 respectively) and incidence of long-term illness below it (12.7% locally compared to 18.2% nationally). Nevertheless concerns about increased obesity levels suggest that any policy initiatives that contribute to healthier communities are desirable.

The Plan cannot affect human health directly. All it can do is increase the opportunity for a healthier approach to some daily activities. A substantial number of policies are supportive notably: sustainable transport and the Rapid Transit links (healthier options for commuting); cycleways; links

between the settlement and retail hierarchy (work and services available near the home and accessible on foot or cycle); provision of play space and of open space, the latter within settlements and in the adjacent countryside where they are again readily accessible on foot or by cycle. Policy on housing density can assist by increasing the amount of housing provided in suitable central sites within easy walking distance of employment or amenities, while policies to prevent contamination of water courses and limit air pollution also contribute.

Policies with potentially significant beneficial impact: GB/6, HG/1, HG/3, HG/4, HG/5, SP/7, SF/11, SF/12, SF/13, NE/11, NE/12, NE/19, NE/20, TR/1, TR/4. As noted above the impact of these policies cannot be calibrated because this will depend on how many people make use of the opportunity to get more exercise, commute by other modes of transport, etc.

Policies with potentially significant adverse impact: none identified.

There are potential secondary impacts from poor air quality which has been identified under objective 4.1, and which might contribute to localised incidence of respiratory problems.

### 5.2 Reduce crime and the fear of crime

Crime does not appear to be a problem with local rates a little above half those across the county (57 per 1000 people, compared to 94), and with a small drop in rates over the last two years. It is not clear how crime rates compare to those in Cambridge, and whether the higher county-wide rate reflects higher incidence in larger urban areas. The most recent Quality of Life survey reveals 70% of residents feel safe or fairly safe after dark, which is better than the level across the county as a whole but still capable of improvement. It is not clear whether relatively high proportion of District residents who live in small communities contributes to this figure.

Primary responsibility for reducing crime lies with other authorities, and the Plan can only do so much to meet this objective. Its main focus is on ensuring design of new developments does not provide opportunities for crime by providing well-lit paths and cycleways and play areas, other open space that are extensively overlooked, and avoiding warren-like development in areas of higher housing density.

Policies with a potentially significant positive impact: DP/3, NE/17.

Policies with potentially significant adverse impact: none identified.

There are no secondary or other impacts evident, nevertheless the policies above will only affect new development. Low crime levels suggest tackling fear of crime by, for example, careful improvement of lighting in villages may not be a priority, but the Plan does not currently address the recognised need to further improve the number of residents who feel safe.

### 5.3 Improve the quantity and quality of publicly accessible open space

Local performance on this objective is below standard with local provision 25% below the equivalent level across the county, and the most recent

District audit shows that some small villages have no informal recreation space.

The Plan addresses this objective through policies which will ensure new development incorporates open and play space at least equivalent to national guidelines. In principle under-performance could be addressed by requiring increased open space provision, but it is possible this would create problems for the design of the new settlement, resulting in greater housing densities than those envisaged. The Plan also provides for use of Section 46 contributions to fund open space improvements, and in several cases these are specified for individual housing allocations.

Policies with a potentially significant beneficial impact: GB/2, GB/6, GB/7, 7 housing allocations in SP/1, SP/7, SP/19, SF/11, SF/12, SF/13, NE/5. As noted above, the Plan makes provision for more open space in line with national standards, however this will only be proportionate to the scale of new development, and further provision may need to be made to improve the situation in a substantial number of villages which have open space but which have poor quality facilities that need replacing.

Policies with potentially significant adverse impact: none identified.

#### 6.1 Improve the quality, range and accessibility of services (eg. health, transport, education, training, leisure opportunities)

County monitoring shows that 83% of the District's population lives in communities with low levels of provision or ready access to basic services, such as a primary school, doctors' practice, shop, and regular and convenient public transport. Anecdotal evidence suggests that villages have been losing services. This presents a dilemma for the Plan since it must balance the need to improve conditions in these communities while ensuring development occurs in the most sustainable locations.

The Plan deals with rural service loss primarily with preventative policies to limit further reduction in amenities. Instead it places greater emphasis on improving amenity in larger centres in parallel with policies on sustainable transport and housing. Its objective is to locate amenity where it is readily accessible to the greatest number. Concentrating development on the most accessible settlements is supported by the local market for services and by promoting these centres they should attract further services, improving the range of shops and amenities that can be visited during a single trip.

Policies with potentially significant beneficial impacts: ST/3, GB/6, DP/2, 3 housing allocations in SP/1, SP/2, SP/3, SP/7, SP/14, SP/15, SP/19, ET/10, SF/1, SF/2, SF/3, TR/1, TR/6. Beneficial impacts should be achieved by linking policies on settlement hierarchy, housing, retail and employment allocation and transport so that they are consistent and mutually-reinforcing.

Policies with potentially significant adverse impacts: none identified.

The mutually reinforcing nature of the settlement and other hierarchies is probably the principal synergistic impact of this Plan. At this stage it is not possible to calibrate the combined effect since the number of new businesses, shops, etc. and levels of use of sustainable transport to reach these facilities is not known. However, as noted above, the Plan provides only



a safety net to prevent further loss of crucial facilities in small settlements. Some of these will see new housing allocations, and the lack of local amenities means there will be an incremental increase in vehicle trips. However it is not within the power of the Plan to reverse the recent trend and mandate the re-establishment of lost amenities, unless this can be achieved through Section 46 agreements.

The principal cumulative impact of this policy has been identified for other objectives. Focusing development on certain centres will add to pressures on land use, and achieving and achieving the most sustainable pattern of land use will be partly influenced by the operation of the open property market.

#### 6.2 Redress inequalities related to age, gender, disability, race, faith, location and income

The Scoping Report provides two general statistics which illustrate the difficulty of measuring this objective. The most recent Quality of Life survey shows 70% of residents regard their local environment as 'harmonious' (compared to a county-wide figure of 64%) and an Index of Multiple Deprivation score of 6.9, a little over half the county average. The latter figure is not particularly surprising given the largely rural nature of the county and the nature of local employment growth which has largely been in sectors offering attractive salaries. However this situation can easily overlook the existence of pockets of deprivation, particularly in the smaller villages.

The Plan aims to balance the need to redress inequalities with the need to promote and expand the local economy. There is a clear priority towards promotion of the research and IT sectors which are the sub-regions strengths, although creation of employment for other groups is not overlooked.

It might be argued that the Plan fails to deal with locational inequalities evident in the discussion of objective 6.1, however there are sustainability benefits in focusing development on the principal centres and this is also consistent with guidance in PPS1, PPG3 and PPG6.

However the principal focus of the Plan is on the impact of increasing house prices and the impact this has on the freedom to relocate, particularly among low wage earners. Policy on housing for intermediate and key workers acknowledges the imbalance between their earnings and their importance to the community. This might be addressed under this objective although further comments are provided under objective 6.3.

Policies with potentially significant beneficial impacts: ST/1, DP/2, HG/2, HG/3, HG/4, HG/5, ET/2, SF/1, TR/1, TR/3, TR/4. These policies fall into two groups. One set will address the mismatch in supply, demand, and cost in the local housing market. Others address another aspect of disadvantage that is not evident in the objective itself. They facilitate improvement in public transport services or alternative travel modes which will benefit those without a car or who are unable to drive. Indeed, other policies on affordable housing provision can also ensure it is provided in more central locations so that those with mobility problems have easier access to services, and this requirement is catered to in policy HG/3 specifically under Special Needs Housing.



Policies with potentially significant adverse impacts: none identified. As noted above there are locational inequalities evident in the poor availability of services and other amenities in smaller communities. Unfortunately one problem is that the limited size of the local community makes it difficult to justify the cost of some facilities, although Section 46 agreements for new housing allocation might provide a solution in some places.

Note also that the Scoping Report identifies the need to provide for the District's traveller population, and the current Plan states that Council policy on this issue will be defined in a separate DPD.

### 6.3 Ensure all groups have access to decent, appropriate and affordable housing

A Land Registry survey shows that the house price-to-earnings ratio of 6.6 in 2003, which was in line with the East of England average, but which is rising and which will be disadvantageous to those on low or modest incomes. Moreover, in common with elsewhere in the county, too much of the recently-added stock has comprised large 4-5 bedroom houses on spacious plots. The situation is worsened by recent completions in which only 19% were classed as affordable, although this is almost double the average rate over the period 1998-2003 but below the 30% target specified in ODPM guidance. The Council acknowledges that current provisioning does not meet Housing Needs Survey requirements of 800 units immediately, and a further 1047 per year thereafter, and that the requirement for this form of housing is growing.

The Structure Plan provides for completion of 20,000 new homes in the District over the period 1999 to 2016, and this represents a clear opportunity to reverse recent adverse trends. New stock is needed to re-house those living in sub-standard accommodation at present, but the continuing growth of the sub-region must be matched with a growth in infrastructure and public services. Key and intermediate workers are unlikely to be attracted to the region if appropriate-priced housing is in short supply.

The Plan quite clearly addresses this issue head-on. Policy HG/3 sets a very low threshold of one-for-one provision of affordable and open market housing on all developments of two or more dwellings. This appears somewhat as emergency surgery and it is not evident what impact the threshold will have on developers' willingness to bring forward land, particularly on smaller plots that offer few economies of scale in construction. Consequently there is a slight risk that affordable housing will be focused on the larger settlement, an outcome that supports objective 6.1 and others, by which appears to conflict with 6.2.

Policies with potentially significant positive impact: ST/1, DP/4, HG/1, HG/2, HG/3, HG/4, HG/5, SP/3, SP/11, SP/18, ET/2. In addition to the above, several housing allocations proposed in the adopted Local Plan include use of Section 46 agreements to secure affordable housing provision, although this is superseded by policy HG/3 which will apply to all allocations in the DPD unless the Council grants a waiver.

The new allocations for Northstowe, Cambridge East and the allocations in policy SP/1 provide for more than 16,500 new homes. At 50% provisioning

this will clear the outstanding shortfall in stock and provide for around seven years' needs at the rates specified above.

It is also important to acknowledge the key underpinning role played by policies HG/1, HG/2 and HG/4 in increasing densities, ensuring that the type of housing reflects local requirements by limiting the number of large units built and increasing the proportion of one and two bedroom properties, and in providing funding for such developments.

Policies with a potentially significant adverse impact: none identified, however see below. Note also the Scoping Report acknowledges the Council's obligation to provide for the travelling community, however we understand this will be addressed in another DPD.

As noted above, there is a concern that the low threshold for affordable housing provision may act as a disincentive particularly to the development of smaller plots. There are also concerns that targets for providing energy efficient and renewables technology could affect construction costs. However policy NE/1 only applies to developments of 10 homes or more, and there are elements of good structural design that can be used to reduce energy loss without significantly affecting construction costs.

Concerns about the potential impact of focusing development on a limited supply of suitable land in the most sustainable centres on land prices has been discussed under several of the preceding objectives.

#### 6.4 Encourage and enable the active involvement of local people in community activities

This is the one objective that is not particularly well-served by the DPD, certainly in terms of policies that have a direct bearing. Increased community involvement has been a hallmark of the current government, down from the establishment of National and Regional Assemblies to encouraging more consultation on decisions that affect the local community. Material in the Scoping Report focuses on the aspect of community involvement in decision-making, however this is difficult to measure accurately and objectively. Nevertheless the Scoping Report notes the most recent Quality of Life survey shows only one in five residents considers that they can influence decisions affecting the local area, and this leaves clear room for improvement.

Policies with a potentially significant beneficial impact: DP/2. This objective lies in Inclusive Communities topic and this policy prioritises the need for a feeling of involvement but, in this case, with communal activities rather than decision-making. We consider this might be a more meaningful criterion, although it may be equally difficult to measure. Moreover this objective is supported implicitly by other policies that provide for social infrastructure and which are intrinsically supportive even though it is difficult to judge the magnitude of their impact.

Policies with a potentially significant negative impact: none identified.

Cumulative and other impacts: none identified.

### 7.1 Help people gain access to satisfying work appropriate to their skills, potential and place of residence

Unemployment has remained consistently low around the last 5 years at around 1%. This is well below the county average and suggests this will not be a problem provided the appropriate employment can be provided for the new residents of the new communities and new arrivals in existing ones. Although attention focuses on Cambridge as a centre of excellence in various disciplines, several facilities lie in the District (eg. the Genome Centre at Hinxton) and with little remaining available land within the city boundary the expansion of the sub-regional economies will increasingly depend on new facilities being provided in the District.

However one adverse trend in the current employment situation is that over a third of the District's population travel more than 5kms to work, although this is lower than the regional average and to be expected given its dispersed settlement pattern.

The key word in this objective is access since it has two connotations: access to jobs by attracting new employment, and convenient access to work represented by a reduction in commuting distances. The former is only addressed directly by the employment land policies in SP/4 and SP/5, largely because the Council's role is to facilitate the provision of adequate land in suitable locations, but not to attract companies. A wider range of policies such as ET/3 (clusters) establish the spatial expression of this policy. Since clusters do not have to be large they can provide a sudden boost in local employment in easy reach of more modest sized communities. For example policy SP/4 provides for a science and business park to be located to the southwest of Longstanton, while a substantial housing development just to the north (policy SP/1m) will provide local accommodation and hopefully limit the distance that new residents and workers commute.

Easier physical access to employment is clearly the objective of many of the most generic policies that link together the settlement and retail hierarchies, and housing density, in order to bring new employment closer to new and existing residents.

Moreover in recognition of the purpose of objective 6.2, policies such as ET/4 and ET/10 aim to facilitate appropriate levels of rural employment consistent with their surroundings. Similarly a number of the SP/1 housing allocations increase capacity in settlements where there is limited expansion of existing local non-agricultural industry.

Policies with potentially significant beneficial impacts: HG/1, 8 housing allocations in SP/1, SP/2, SP/3, SP/4, SP/5, SP14, ET/2, ET/3, ET/4, ET/5, ET/6, ET/10, TR/1, TR/6. All these policies help to facilitate expansion of a sustainable base of new employment, though their significance depends on how much employment can be attracted to the sub-region by other agencies.

Policies with potentially significant negative impacts: SP/1I and SP/11. SP/11 deals with the possible redevelopment of a large area in the centre of Papworth Everard if the hospital is relocated. The main concern is the potential impact of relocating the principal local employer on commuting patterns, and we must assume this will be taken into account when/if planning

this event begins. The issue at Guilden Morden concerns the level of housing growth in a village with no employment locally or in the immediate vicinity. However overall impact is likely to be negligible on a District-wide scale.

The principal synergistic impact has been mentioned for other objectives, namely the planned co-location of housing and work to reduce commuting times and encourage modal shift wherever possible. As also noted elsewhere this will place pressure on the available stock of land, and in all likelihood it will affect freehold prices.

#### 7.2 Support appropriate investment in people places, communications and other infrastructure

There is currently no data available and this objective will be difficult to measure. We assume appropriate investment will encompass private and public sector projects, with a sizeable proportion of the former being securing through Section 46 agreements.

The Scoping Report contains a statistic about education achievement rates, which appears more appropriate to objective 7.1. However the assessment of housing allocations shows intermittent problems with local primary school capacity, and a widespread shortage of secondary capacity in the village colleges. These data refer to a 2000 survey and it is not clear to what extent these problems have been addressed over the intervening period.

Otherwise the integrated sustainable transport, settlement, retail and other hierarchies appear to be 'appropriate' while policies DP/4 and HG/4 make clear the Council's intention to seek developer contributions wherever it can.

Policies with a potentially significant positive impact: ST/1, DP/4, SP/3, ET/1, ET/3, NE/11, TR/3. Unfortunately the actual significance of these impacts cannot be assessed without more detail of the scale, scope and location of developments to which these policies would apply.

Policies with a potentially significant negative impact: none identified.

Cumulative and other impacts: none identified.

#### 7.3 Improve the efficiency, competitiveness, vitality and adaptability of the local economy

This is another sustainability area that is surprisingly difficult to assess in a robust and effective manner, and the primary indicators are indirect. However recent trends show an increase in viable VAT-registered firms of just below 0.9% per annum, somewhat below the District figure for 2001 and that across the county. It is not clear whether past statements that '*Cambridge is full*' and any constraints on available development land have affected this trend, but the area is also regarded not just as a centre of excellence in R&D and IT but also as an entrepreneurial hotbed.

The Plan cannot directly improve economic vitality and competitiveness on a sub-regional scale, but clearly it plays the leading role in ensuring that land is available at suitable locations for development in line with other objectives and policies, and that the public infrastructure to support growth is provided in

a timely manner. That is clearly the function of a wide range of over-arching policies that have been repeatedly mentioned in the preceeding sections. However particular importance should be attached to policies such as SP/14 to SP/16, and all policies on sustainable transport. Collectively they can reduce the impact of new growth on the road network. This will have a direct benefit in improving traffic flows and efficiency, and a more significant indirect benefit in addressing concerns of companies considering relocating to the District.

Policies with potentially significant positive impact: ST/1, HG/3, ET/1, ET/2, ET/3, ET/5, ET/6, ET/8, ET/11, SF/1, SF/2, TR/1, TR/6. The impacts cannot be judged without further data about the location of new development.

Policies with a potentially significant negative impact: none identified.

As the comments above suggest this objective can be addressed by the interlocking impact of the principle overarching policies, and provided a significant level of modal shift occurs.

## **6.2 HOW SOCIAL, ENVIRONMENTAL AND ECONOMIC PROBLEMS WERE CONSIDERED IN DEVELOPING THE POLICIES**

Social, environmental and economic problems were identified from the initial scoping work and are listed in section 4.4 of this report. The range of policies and options proposed in the Preferred Options Report include measures to address these issues through individual targeted policies (eg. that on landscape character protection corresponds to the need to preserve open views to Cambridge and its skyline).

However the content of this particular, central DPD is dictated also by the Council's statutory obligations to ensure planning policy for the District is consistent with government and regional planning guidance. As a result a substantial number of policies are included in order to show conformance with guidance, including those on areas such as:

- housing density
- affordable housing provision
- car and cycle parking standards
- open and play space provision
- energy efficiency
- retailing location and use of the sequential test

At the Preferred Options Report stage, the Council prepared a set of objectives for each broad policy area (Vision/ Strategy, Green Belt, Housing, etc.) which reflected issues identified in the District Plan (adopted as recently as February 2004). These plan objectives were presented as initial policy options and assessed using the SA Framework (ie. reflecting the requirements of task A5 of current SA guidance, although this had not been published at the time the assessment occurred).

Additionally, many aspects of policy are dictated by central and regional government planning guidance and strategy, government policy on housing, and adopted policies in both the Cambridgeshire Structure Plan and the South Cambridgeshire Local Plan. Options which diverge from this guidance are inherently unsustainable because they fail to conform to principles of sustainable development as laid out in PPS1, PPS12 and other documents.

Appendix 5 cross-references the issues identified in the Scoping Report (see section 4.5) against the policies in the draft AAP to show the extent to which each issue is addressed by at least one policy<sup>1</sup>. The cross-check shows good coverage of the issues, which is to be expected of a Core Strategy and it is easier to focus on the exceptions.

The only issues which are not addressed are:

- The sterilisation of sand and gravel resources: this is primarily an issue for the County's Minerals Development Framework, however ideally it requires a corresponding policy or statement (comparable to that for waste) in the Core Strategy;
- The needs of travellers: the Council has an obligation to serve the needs of this sector of the community, which is stated in text following policy HG/5, however this will be addressed in a separate DPD.
- Cambridge's retail dominance: it is difficult to see how the Core Strategy can address this issue directly if services and amenities are drawn to a established regional centre with a sizeable catchment area including the District.

It should be stressed that Appendix 5 indicates where a policy in the DPD can contribute to dealing with a particular issue but it is not possible to determine whether it will play a leading role or contribute indirectly. We would expect the Core Strategy policies to have a significant effect across a wide range of policy areas, others may be addressed more effectively by mechanisms outside the LDF. The table does not suggest that the DPD is a panacea for all these issues, but demonstrates that they have been addressed to some degree by its range of plan policies.

### 6.3 PROPOSED MITIGATION MEASURES

As noted previously, a large number of the policies in the DPD are mitigation measures in their own right. Across the rest of the policies, apart from a small number of cases, the mitigation proposals fall into two categories:

- Measures to be defined in development briefs for specific sites.
- Adjustments of policy text or the supporting text.

The full set of mitigation proposals are shown in Appendix 6.

### 6.4 UNCERTAINTIES AND RISKS

Guidance on the SA / SEA methodology places great stock on the need to assess the magnitude and significance of a range of different impacts using a range of appropriate assessment techniques. This DPD contains two broad types of policy both of which have potentially significant impacts:

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<sup>1</sup> The original cross-check was based on the Preferred Options Report, which contained 117 policies. Table 10 is based on identifying the corresponding policy area in the draft DPD; in some cases this may be policy itself or the supporting text.



- Generic policies on housing, transport, sustainability, environmental conservation, etc., which will have wide-ranging impacts across the District because they will influence all developments that affect land use changes, improvements in public services, etc.
- Development control policies which impose criteria at individual locations.

However, for a plan of this nature, significance is affected by the magnitude and duration of impacts, and also – crucially – by the number of locations where the policy has an impact. The pervasive impact of generic policies means that they will have a wide-ranging impact although it is difficult to calibrate the exact magnitude. The impact of development control policies can only be calibrated on a case-by-case basis once the nature of the land use proposal is known.

For these reasons the principal uncertainty affecting this plan is the extent to which the impacts we have identified are genuinely significant either individually or cumulatively.

These qualifications do not apply to the same extent to the site-specific allocations in section SP of the DPD. Our detailed assessments make reference to material collected in a 2000 survey of village services and amenities. This is the most recent data available to a desk survey, however clearly the information on the number of shops, frequency of bus services, and capacity of nearby primary and secondary schools, is now some years out of date. Many of the housing allocations proposed in policy SP/1 are small enough that they might not require an EIA once taken forward and therefore there will need to be a corresponding mechanism during planning application assessment to checking the sustainability of the proposal using more up to date information, where this is available.

However given the generic nature of many of the proposals there are no other concerns to comment on, and we would expect this situation to be representative of other Councils' Core Strategy DPDs.

## 7 IMPLEMENTATION

### 7.1 LINKS TO OTHER TIERS OF PLANS AND PROGRAMMES AND THE PROJECT LEVEL (ENVIRONMENTAL IMPACT ASSESSMENT, DESIGN GUIDANCE, ETC)

The detailed assessments have identified a wide range of mitigation needs which require more specific guidance or definition of certain areas of policy. The Council is currently developing a list of documents that will be incorporated into the LDF and which will address these requirements in due course, specifically:

- A planning obligations SPD, which will indicate the type of contribution that may be sought in conjunction with specific types of development. The Site Specific Policies section indicates a number of instances where the type of contribution has been specified already (eg. for bypasses at Longstanton and Papworth Everard from housing allocations proposed for the adjacent villages).
- A design guidelines SPD, providing additional detail on appropriate design, materials, layout, etc., for the general street scene but possibly also for conservation areas.
- An open space standards SPD, providing guidance on good design including safety.
- An energy efficiency SPD, providing guidance on appropriate technologies and design approaches for energy conservation.

This is a provisional list based on comments received from the Council during this assessment and is not a formal commitment on their part.

A further priority is the preparation of Development Briefs for the principal land allocations covered by policies SP/1 to SP/5 inclusive. The adopted Local Plan includes a substantial amount of explanatory text about the setting of each allocation which identifies specific local issues (eg. proximity to a dog kennels at one site; presence of known or suspected archaeological remains at several others). This detail has not been incorporated into the current wording of policies in SP/1, although it has been used in the assessment. The issues identified for each site will therefore need to be incorporated into a Development Brief to ensure the key issues are identified and can be investigated in an EIA of the proposal as appropriate.

### 7.2 PROPOSALS FOR MONITORING

ODPM published new guidance in March 2005<sup>2</sup> addressing the requirements for monitoring the effectiveness of plans in the LDF. While this does not deal directly with the requirements of SA Task E1, there is a clear opportunity to integrate the two processes as far as possible to prevent duplication.

The guidance advocates:

- No more than 50 parameters in total (for the initial LDF)

<sup>2</sup> ODPM, Local Development Framework Monitoring: A Good Practice Guide, March 2005.

- No more than 3-4 indicators per policy objective
- Also include indicators relating to the most relevant local issues and any significant effects identified in the assessment.

Our proposed monitoring plan takes a pragmatic approach to the guidance since it is not possible to provide 3-4 indicators per objective, and ensure appropriate significant impact indicators are included, within a 'budget' of 50 objectives. Moreover the extremely broad scope of the Core Strategy DPD in particular means that a wide range of potentially significant indicators can be recommended in order to cover the full breadth of policy areas.

Monitoring proposals are presented in Appendix 6. Finalising the monitoring plan is the Council's responsibility and it will also determine which parameters are to be included in the programme. This table presents our initial recommendations, which are based on the baseline and impact assessment summarised in this report, for the Council's consideration.

Note that Appendix 6 presents a table of parameters identical to those proposed in the Core Strategy since it is essential that a common monitoring framework applies to the LDF.

In practice the SA / SEA and LDF indicators should be largely the same; if they are not then some indicators are redundant, or one or both programmes are overlooking potentially important parameters.

In addition to these parameters the Council may need to adapt the monitoring programme to incorporate other indicators reflecting its statutory obligations (eg. those relating to Best Value Performance) or dealing with other issues that lie outside the scope of the DPD.

