



# **South Cambridgeshire Local Development Framework Development Control Policies Development Plan Document**

## **Sustainability Appraisal / Strategic Environmental Assessment Adoption Statement**

### **Introduction**

South Cambridgeshire District Council adopted the Local Development Framework (LDF) Development Control Policies Development Plan Document (DPD) on 19 July 2007.

This statement has been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (16) (3) and (4), which require a statement to be produced on adoption of a plan or programme, to detail:

1. How environmental considerations have been integrated into the plan or programme;
2. How the Environmental Report has been taken into account;
3. How opinions expressed through public consultation have been taken into account;
4. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;
5. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

Planning Policy Statement 12 widens these considerations from environmental, to broader sustainability issues, so that this statement provides information on the wider sustainability appraisal process.

This statement examines each of these points in turn.

## **1. How sustainability considerations have been integrated into the plan**

The LDF aims to improve the overall quality of life for residents of South Cambridgeshire in a way which will also benefit future generations. Taking a sustainable approach to economic, social and environmental issues is at the heart of the plan and will be closely related to the national strategy for sustainable development which has four objectives:

- Social progress which recognises the needs of everyone;
- Effective protection and enhancement of the environment;
- Prudent use of natural resources; and
- Maintenance of high and stable levels of economic growth and employment.

### **Policy Context**

The national context is set out in Planning Policy Statements (the replacement to Planning Policy Guidance Notes), Circulars and other advice from Government. Whilst some of those national policies require local interpretation, a great number do not.

The regional context is set out in the Regional Planning Guidance for East Anglia (RPG6), which was approved in November 2000. It aims to focus a higher proportion of Cambridgeshire's growth into the Cambridge Sub-Region and proposes a sequential approach to the planning of development, with much of the development concentrated into and on the edge of Cambridge (subject to a review of the Cambridge Green Belt), including development in South Cambridgeshire, and into a new town beyond the outer boundary of the Green Belt.

RPG6 informs the strategy in the Cambridgeshire and Peterborough Structure Plan 2003. This will be the last of its kind and will be superseded by a new Regional Spatial Strategy for the East of England. Whilst under the terms of the new plan making system the LDF must be in general conformity with RPG6, in the circumstances of the Cambridge Area it is also appropriate and consistent for the LDF to meet the policy requirements of the Structure Plan, as there is currently no evidence that the draft RSS is proposing divergent emerging policies on the development strategy for the sub-region relative to those set out in the current RPG and the 2003 Structure Plan.

The East of England Regional Spatial Strategy (RSS) will replace the Cambridgeshire and Peterborough Structure Plan when it is published in its final form by the Secretary of State. A number of Structure Plan policies will be 'saved', and remain valid until at least 28 September 2007, under the transitional provisions of the Planning and Compulsory Purchase Act 2004.

## **Development Control Policies Policy Approach**

The Development Control Policies DPD sets out the principles that need to be taken into account in new development, whether large or small and for whatever use, whether new buildings or conversions of existing ones, so that the special qualities of the area remain, in order to achieve attractive, high quality sustainable places where people want to live, work and relax.

### *Development Principles*

The Development Principles chapter draws together the issues that need to be considered in determining planning applications in order to achieve sustainable development. This includes ensuring new development is focussed within the built-up parts of the district and built to a high quality of design, makes provision for all necessary infrastructure to serve the development and uses sustainable methods of construction.

### *Green Belt*

The Cambridge Green Belt serves a number of purposes derived from national guidance in PPG2 and the Cambridgeshire Structure Plan 2003; notably it keeps land open and free from development, preserves the character and setting of the historic city as a compact centre, prevents urban sprawl and coalescence. As such it encourages the reuse of land within the city and villages, minimising the use of greenfield land and restricts development on the edge of the built-up area away from services and facilities often located at their historic heart. It also provides opportunities for good access to open countryside for recreational purposes.

### *Housing*

In accordance with the development strategy in the RSS, Structure Plan and Core Strategy DPD, as the most sustainable urban centre in the Cambridge Sub-Region, development is focused within Cambridge and in urban extensions to the city. High density, high quality, sustainable development will provide the opportunity for people to live closer to their place of employment and access services and facilities, reducing travel distances and maximising opportunities to provide quality infrastructure to facilitate movement by non-car modes. Provision of a mix of house sizes and types, including affordable housing and lifetime homes, will provide people with a choice of houses to meet local needs.

Careful control over houses in the countryside will ensure development is focussed in the more sustainable locations whilst meeting essential local needs for properties in the rural area, for example, associated with rural employment.

### *Employment*

There is a selective management approach in the area close to Cambridge that discriminates in favour of uses that have an essential need for a Cambridge location. This will continue to support the high technology research and development sectors

of the economy that have made the Cambridge area such a success. The encouragement of clusters of companies and organisations operating in a similar field of activity enables the sharing of expertise in a particular locality.

Established business parks in the countryside, employment in villages and farm diversification provide opportunities for people to work close to where they live and keep the rural economy alive. Careful control of employment uses in the countryside restricts sporadic development to those uses where a rural location is essential.

#### *Services and Facilities*

Protection of existing community facilities and services, including village shops, open space, play space and recreational facilities, and facilitating further development of an appropriate scale in villages will assist with the retention of balanced communities in the rural area, and minimise the need to travel to meet day to day needs.

#### *Natural Environment*

Addressing climate change through energy efficiency and the use of renewable energy in new development.

Protection of natural resources by respecting landscape character, biodiversity and protects the best agricultural land. Ensuring development mitigates against flooding, conserves water, and minimises pollution – light, noise, air and land.

#### *Cultural Heritage*

Protection of historic resources including historic landscapes, archaeological sites, listed buildings, and conservation areas, and other sites of importance for their character and amenity.

#### *Travel*

Minimising the need to travel and maximising travel choice by all modes to promote the use of non-car modes by ensuring the provision of adequate infrastructure through new development, and ensuring new development mitigates its travel impacts.

#### *Monitoring*

The Development Control Policies DPD also includes a series of indicators that will be monitored through the LDF Annual Monitoring Report. The impact of the plan can therefore be monitored, and a review triggered if conditions require it.

## **2. How the Sustainability Appraisal had been taken into account**

The Sustainability Appraisal has contributed to plan development by providing an independent assessment of the sustainability of the Council's proposed options and policies as they were developed. It demonstrates that sustainability considerations have been incorporated into the development of the DPD from an early stage, and provides a formal statement and audit trail of the assessment.

The Sustainability Report is a key output of the plan preparation process. It reflected and supported the draft plan on which formal public consultation and participation was carried out. The report was prepared in support of the Core Strategy DPD, Development Control Policies DPD, and Site Specific Policies DPD in combination. Appraisals of the Northstowe, Cambridge East, and Southern Fringe Area Action Plans were submitted in parallel, which had the advantage of providing an even greater level of detailed analysis of the impact of policies in the Development Control Policies DPD.

The process began with preparation of the Sustainability Appraisal Scoping Report. This formed a useful part of the evidence base for the early stages of plan preparation. It provided information on other relevant plans and strategies, from European to local level, and analysed which objectives and requirements were relevant to the preparation of the South Cambridgeshire Local Development Framework.

The information gathered was used to create a set of sustainability objectives, which could be used to test emerging options and policies. A consistency matrix was used to test any tensions between these objectives. A set of indicators was also created, to provide evidence on the current state of the environment, as well as social and economic factors. These indicators were tested against other geographical areas to provide a comparison. This helped to identify priorities for South Cambridgeshire and any existing problems. It also highlighted policy issues that should be explored.

The key sustainability issues identified in the Scoping Report influenced the development of plan policies and objectives. Section 6.2, and Appendix 5, of the Final Sustainability Report specifically analyses the impact of policies on these wider sustainability issues. The objectives of the draft plan were tested against the sustainability objectives, through the Initial Sustainability Report. This provided information to the Council and representors on the compatibility between plan objectives and sustainability objectives.

The significant effects of the options, and subsequent policies, were analysed against the sustainability objectives, which provided information on their economic, social and environmental impact. Analysis included the scale and nature of the impact, cumulative, secondary and synergistic impacts. Both detailed testing matrices, and written summaries were included in the Final Sustainability Appraisal Report. This provided useful information to both representors and the Inspectors on the impacts of the policies of the plan.

The analysis of the impacts of the plan proposals also indicated opportunities to improve the sustainability of the plan, and indicate mitigation measures. The measures envisaged to prevent, reduce and as fully as possible offset any significant effects on the environment, as well as social and economic objectives, are summarised in Appendix 6 of the Final Sustainability Report. A number of changes were made to plan options, and subsequently plan policies, as a result of the analysis in both the initial and the draft final, and the Final Sustainability Appraisal Reports.

### **3. How consultation taken into account (draft plan and the Environmental Report)**

In this statement the Council is required to detail how opinions expressed in response to consultation have been taken into account.

#### **Key Environmental Bodies**

The Strategic Environmental Assessment Directive requires that authorities referred to in Article 6 (3) shall be consulted when deciding on the scope and level of detail of the information which must be included in the Environmental Report. In England, the key bodies are the Environment Agency, English Heritage and Natural England (formerly English Nature and the Countryside Agency).

Consultation on a draft of the Sustainability Appraisal Scoping Report with these key bodies was carried out in June 2004. The consultation enabled these bodies to comment on the appropriateness of the objectives, indicators, baseline assessment and issues / problems. A report on the outcome of these consultations is included in Appendix 7 of the Scoping Report. The consultation resulted in a number of changes to the Scoping Report, including changes to the sustainability objectives and questions, new issues for the area being identified, new plans and strategies being analysed in the report, and revised and new monitoring indicators.

#### **Public Participation**

The Strategic Environmental Assessment Directive requires early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying Environmental Report before the adoption of the plan or programme or its submission to the legislative procedure. The Council undertook a programme of public participation on the plan and its Sustainability Appraisal prior to submission to the Secretary of State. Full details can be found in the 'Statement of Statutory Bodies Consultation and Pre-Submission Public Participation (REGULATION 28 STATEMENT)', available to view on the Council's website.

## **Consultation under Regulation 25**

### *Statutory Bodies Consultation*

The Council carried out an initial consultation with statutory bodies on all the matters which would be covered by the DPDs, as required under the new system of plan making, to ensure that it was aware, at an early stage of any programmes and plans that would affect the LDF. This took place under the “jumping the gun” regulations, in the lead up to the new system of plan making which did not come into force until September 2004. The consultation took the form of a letter highlighting general issues relating to the proposed Development Plan Documents, and seeking comments on issues that should be considered. The responses received were taken into account in preparing the Preferred Options Reports. A summary of the main issues raised and how the issues were addressed can be found in Appendix 1.

### *Preferred Options*

Public consultation at this stage provided the public the opportunity to participate on options, before the decision was made on the preferred approach.

Initial Sustainability Appraisal Reports were included as annexes to the Preferred Options Reports. Whilst no representations were received specifically on the initial appraisal of the Development Control Policies DPD, a total of 1,104 representations were submitted to the Development Control Policies DPD. A summary of the main issues raised and how the issues were addressed can be found in Appendix 1.

A consultation draft Sustainability Appraisal Scoping Report was also included in the public participation at the Preferred Options stage of the LDF preparation. This also included consultation with a wide range of statutory bodies. The Preferred Options Reports were published in October 2004 and were subject to a six-week long public participation period. During this period, over 6,000 representations were received, 30 of which specifically related to the Scoping Report. A report on the outcome of the public participation is included in Appendix 8 of the Sustainability Appraisal Scoping Report. The consultation resulted in a number of changes to the scoping report, including changes to the sustainability objectives and questions, new issues for the area being identified, new plans and strategies being analysed in the report, and revised and new monitoring indicators.

## **Consultation under Regulation 26**

The Pre-Submission Public Participation DPDs, together with the draft Final Sustainability Reports allowed the public to consider the Council’s reasons for selecting their preferred options in the context of a compliant environmental report and to seek to persuade the Council to opt for another, different approach. A single set of proposals, in the form of the pre-submission DPDs, allowed consideration of a holistic view in the draft final Sustainability Report and for the assessment of cumulative and synergistic effects. It included an outline of the process of selecting and rejecting options.

Appraisals of the Core Strategy DPD, Development Control Policies DPD, and Site Specific Policies DPD were bound together in one document. 20 representations were received in relation to the appraisal. A further 1,152 representations specifically related to the Development Control Policies DPD. A summary of the main issues raised and how the issues were addressed can be found in Appendix 1.

The Sustainability Appraisal Scoping Report was also subject to further public participation at the Pre-Submission Public Participation stage. 11 representations specifically related to the scoping report. A schedule of responses is included in the Sustainability Appraisal Scoping Report 2006. The majority of representations related to health issues. Changes were made prior to publication of the Sustainability Appraisal Scoping Report, alongside the Final Sustainability Appraisal. They include additional details from additional plans and strategies relating to health issues.

### **Submission**

On submission of the DPD, accompanied by the Final Sustainability Report, a further 602 representations were received, which were considered by independent Inspectors through the Examination process.

## **4. Reasons for choosing the document as adopted in light of other reasonable alternatives.**

The Environmental Assessment of Plans and Programmes Regulations 2004 (12) (2) requires environmental reports to examine reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

This statement is required to set out the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with.

PPS12 makes clear that full regard should be had to the chain of conformity to avoid duplication of assessment. RPG6 and the Cambridgeshire Structure Plan provide a very clear strategy. This limited the number of available reasonable alternatives, as non-conformity with the clearly established strategy in a recently adopted higher order plan would make an alternative unreasonable. The Structure Plan was subject to Sustainability Appraisal.

The appraisal of alternatives is documented in the Final Sustainability Report. Appendix 2 of the report details the options selection process, and sets out why certain options were not considered reasonable. The preferred options reports included a number of options, each of which were appraised through the initial appraisal reports, to assist decision making of both the Council, and to inform representors. This process is also captured in Chapter 5 of the Final Sustainability Report. Sustainability Appraisal involves testing each reasonable plan option against the SA Framework to determine their performance in sustainability terms. The process is fully documented, including the reasons for eliminating options.



Following Examination of the DPD, the binding Inspectors' Report states that, 'The SA identifies the extent to which policy alternatives are constrained by such matters as the Structure Plan and government guidance. SA is required to do no more than assess reasonable options, an obligation which we consider has been fully fulfilled, and this test is met. We are satisfied that the changes which we recommend are either within the scope of the SA or have been subject to SA within the representations put to us.'

## **5. Monitoring**

The Environmental Assessment of Plans and Programmes Regulations 2004 requires authorities to set out the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

Details of the monitoring measures envisaged are summarised in Appendix 4 of the Final Sustainability Report.

The indicators created in the Sustainability Appraisal Scoping Report, will continue to be monitored annually. They have been utilised as 'significant effect indicators', to be collated in the LDF Annual Monitoring Report. This report includes an analysis of the implications of the results, and should a need arise a review of LDF documents could be triggered by this information.

The South Cambridgeshire Annual Monitoring Report is available to view on the Council's website.



## **Appendix 1: Extract From 'Statement of Statutory Bodies Consultation and Pre-Submission Public Participation (REGULATION 28 STATEMENT)'**

### **7. Sustainability Appraisal Scoping Report**

#### **Statutory Bodies Consultation on Draft South Cambridgeshire Sustainability Appraisal Scoping Report**

- Consultation with statutory bodies took place in June 2004.
- Key agencies that have environmental, social or economic responsibilities (the Environment Agency, English Nature, English Heritage, and the Countryside Agency).
- All four bodies responded.
- A schedule of responses is included in the Sustainability Appraisal Scoping Report 2006, and is available to view on the District Council's website ([www.scambs.gov.uk](http://www.scambs.gov.uk)).
- Summary of main issues raised: The consultation enabled these bodies to comment on the appropriateness of the objectives, indicators, baseline assessment and issues / problems. Additional Sustainability Objectives, decision making criteria, and monitoring indicators suggested. A number of local sustainability issues raised, including historic environments, water and drainage, and biodiversity.
- How were issues addressed: Changes were made prior to publication of the Consultation Draft Scoping Report. They include additional Sustainability Objectives, decision making criteria, and monitoring indicators.

#### **Consultation Draft South Cambridgeshire Sustainability Appraisal Scoping Report**

- Public consultation took place during a 6 week period from Friday 1 October 2004 to 12 noon on Friday 12 November 2004 (alongside Preferred Options Reports).
- 30 representations specifically related to the scoping report.
- A schedule of responses is included in the Sustainability Appraisal Scoping Report 2006, and is available to view on the District Council's website ([www.scambs.gov.uk](http://www.scambs.gov.uk)).
- Summary of main issues raised: A wide variety of issues were raised, ranging from transport, landscape, to health.
- How were issues addressed: Changes were made prior to publication of the Sustainability Appraisal Scoping Report, alongside the Final Draft Sustainability Appraisal. They include additional Sustainability Objectives, decision making criteria, and monitoring indicators.

## **South Cambridgeshire Sustainability Appraisal Scoping Report**

As part of the Draft Final Sustainability Reports for the six Development Plan Documents, the Sustainability Appraisal Scoping Report was subject to further public participation at the Pre-Submission Public Participation stage.

- Consultation took place in a 6 week period from Friday 17 June 2005 to 12 noon on Friday 29 July 2005.
- 11 representations specifically related to the scoping report.
- A schedule of responses is included in the Sustainability Appraisal Scoping Report 2006, and is available to view on the District Council's website ([www.scambs.gov.uk](http://www.scambs.gov.uk)).
- Summary of main issues raised: The majority of representations related to health issues.
- How were issues addressed: Changes were made prior to publication of the Sustainability Appraisal Scoping Report, alongside the Final Draft Sustainability Appraisal. They include additional details from additional plans and strategies relating to health issues.

## **8. Initial Sustainability Reports**

The Initial Sustainability Appraisal Reports were included as annexes to the Preferred Options Reports. Each option was subject to testing against the Sustainability Appraisal objectives created through the Scoping Report. The Initial Appraisal reports provided a summary of results, and provided valuable supporting information when considering options. Detailed background tables supporting the appraisal of each option are available to view on the District Council's website ([www.scambs.gov.uk](http://www.scambs.gov.uk)).

### **Core Strategy and Development Control Policies (including Site Specific Policies)**

- 1 representation specifically related to the Initial Appraisal.
- A schedule of responses is available to view on the District Council's website ([www.scambs.gov.uk](http://www.scambs.gov.uk)).
- Summary of main issues raised: Issue raised on access to Papworth Hospital.
- How were issues addressed: No change required.

### **Rural Centres**

No representations specifically related to the Initial Appraisal.

## **9. Draft Final Sustainability Reports**

The Draft Final Sustainability Reports meet the requirements for sustainability appraisal and strategic environmental assessment.

They were published for public participation alongside the Pre-Submission Public Participation Draft Development Plan Documents.

### **1. Core Strategy DPD, 2. Development Control Policies DPD, and 3. Site Specific Policies DPD**

Appraisals of the Core Strategy DPD, Development Control Policies DPD, and Site Specific Policies DPD were bound together in one document.

- 20 representations were received.
- A schedule of responses is available to view on the District Council's website ([www.scambs.gov.uk](http://www.scambs.gov.uk)).
- Summary of main issues raised: Whilst there was one support, some representations criticised the complexity of the process, and some representations queried the outcome of individual policy appraisals. Some representations on the failure to appraise alternative options to a number of policies.
- How were issues addressed: Issues raised were considered when appraising policy changes. Sustainability appraisals are only required to assess reasonable alternatives. It is considered that additional options raised in these particular representations did not require appraisal at this stage in the plan making process.

## **2. Development Control Policies Development Plan Document**

### **2.A Statutory Bodies Consultation**

- A total of 281 representations specifically related to the Core Strategy and Development Control Policies. 46 were also received relating to Rural Centres.
- A schedule of responses is available to view on the District Council's website ([www.scambs.gov.uk](http://www.scambs.gov.uk)).

#### **Summary of main issues raised:**

- A variety of transport problems were identified, and specific improvements were requested.
- There was considerable support for the provision of affordable housing.
- Comments highlighted the importance of phasing to ensure infrastructure is in place, and monitoring.
- Comments highlighted the importance of providing sufficient jobs, and supporting the Cambridgeshire economy.
- Specific concerns were raised related to the selection of villages as Rural Centres.
- There were calls for plans to respect green belt boundaries.

- There was support for increased participation of plan development, but some criticism over timescales.
- Calls to protect village character.
- Support for requirements to increase energy efficiency of development.
- Comments emphasised the importance of protecting the natural environment.
- Comments raised the need for some specific village facilities, including an additional graveyard at Gamlingay.

**How were issues addressed:**

Issues raised were considered when the Preferred Options Reports were drafted.

**2.B Preferred Options Report**

At this stage options relating to the Core Strategy DPD, Development Control Policies DPD, and Site Specific Policies DPD were bound together in one document - the Core Strategy and Development Control Policies Preferred Options Report.

- A total of 1,104 representations specifically related to the Development Control Policies.
- A schedule of representations, officers responses and recommended changes to plan is available to view on the District Council's website together with the minutes of the meeting recording the Council's decisions ([www.scambs.gov.uk](http://www.scambs.gov.uk)).

**Summary of main issues raised:**

- There was general support for the Green Belt objectives and boundary definition. Some representations suggest that Green Belt boundaries should be the subject of review at locations other than for the major developments.
- Representations state that windfall assessments may be overestimated, and additional housing allocations are required. There was some support and some objection to the preferred approach to housing density. The majority of representations on housing mix objected to any attempt at a prescriptive approach. On affordable housing targets there was a mixed response, some arguing for the higher targets, primarily on the basis of need, whilst others are concerned that high targets could affect the viability of developments and the balance of communities. On the affordable housing threshold, some responses suggested a higher threshold of 25 dwellings should be used while others seek the threshold of 2 dwellings be used in all settlements.
- There was general support for the preferred options on employment, but a number of representations emphasised the need for monitoring to ensure that policies remain relevant and appropriate. There was general support that the selective management of employment should cover the whole of the District not just the area close to Cambridge. There is also concern that the major developments, primarily Northstowe and Cambridge East, should include a mix of employment types, not just high technology research and development. The other major issue is the amount of land to be allocated for

employment and the impact of higher density development on determining whether this should be reduced.

- There was general support for the Preferred Approach for the protection of village services and facilities. There were representations on the retail hierarchy, in particular stating that Cambridge East's District Centre should be upgraded to the same level as Northstowe's (i.e. town centre), and that Cambourne's centre should be upgraded to a District rather than a local centre.
- Recreation standards drew a mixed response, some pressing for a higher standard, others for a lower standard. Concerns were expressed that developments should only fund facilities related to the development.
- There was general support for the natural environment objectives, and support for developing a criteria based policy on renewable energy sources. The preferred approach to renewable energy in new developments drew mixed representations, support for the principle as well as objections on a number of issues.
- On Preferred Approaches for Landscape Character Areas, Natural Areas, Biodiversity and River Valleys, the majority of responses support these approaches and comment that further guidance should be set out in Supplementary Planning Documents.
- With regard to development and flood risk comment was made that this should be consistent with PPG25 which requires a sequential approach to be adopted using flood zones. Other representations emphasised the need to consider flooding on a catchment basis not just within the floodplain. There was a mixed response to sustainable drainage systems, some minor changes were requested, concern was raised about increased pressures put on developers.
- There was general support for the travel objectives, although many minor changes were requested. There was general support for the preferred option on cycling and walking provision.

#### **How were issues addressed:**

In the majority of cases the preferred approaches were developed into policies in the Pre Submission Public Participation Draft DPD. Some specific changes to the approach were as follows:

- Expanded policy to clarify how development in a Major Developed Site in the Green Belt should be controlled.
- Widened the sustainable development policies to include the recycling of redundant buildings and materials, resource re-use and recycling, and management of spoil and waste from construction.
- Included in development principles policies provision for the storage of recyclables, provision of green space with biodiversity value, provision of public open space, creating a 'sense of place', permeability for non-car modes, accessibility and security.
- Added policy on infrastructure requirements.
- A number of specific changes were made to village frameworks.

- Land supply calculations updated, but continued to show that sufficient land supply had been identified.
- The targets for dwelling sizes based on bedroom numbers in the proportions 50%:25%:25% in the alternative option selected, reflecting the high proportion of properties of 4 or more bedrooms, and the high level of need for 1 and 2 bedroom properties identified in the Housing Need.
- Affordable housing requirement of 50% carried forward into policy, and on affordable housing subsidy, where there are insurmountable subsidy issues, the council may negotiate a lower proportion on larger sites, or accept financial contributions on smaller sites. In light of the high level of identified need, the affordable housing threshold lowered to developments of two or more dwellings in all sizes of settlement.
- Included additional areas as Established Employment Areas in the Countryside.
- Policies developed on farm diversification, tourism (in the Development Control policies DPD) and Duxford Imperial War Museum (In the Site Specific DPD).
- Clarified tests relating to loss of rural employment to non-employment uses.
- Included a policy on protection of recreation facilities.
- Amended the threshold for renewable energy in new developments to 1,000sq m or 10 dwellings. Energy efficiency amended to encourage rather than require 10% reduction in CO<sub>2</sub> emissions above that required in the building regulations.
- Revised approach to flooding to include reference to a risk based approach, based on a sequential approach to development, utilising flood zones information, to better reflect PPG25.
- Additional Protected Village Amenity Area designated at Great Abington beyond those established in Local Plan 2004.
- Included policy in the Site Specific Policies DPD to safeguard Chesterton Sidings Transport Interchange.
- Included policy on walking and cycling.

## **2.C Pre-Submission Public Participation Draft**

At this stage the Core Strategy DPD, Development Control Policies DPD, and Site Specific Policies DPD were bound together in one document - the Core Strategy, Development Control Policies, Site Specific Policies Pre-Submission Public Participation Draft.

- A total of 1,129 representations specifically related to the Development Control Policies (An additional 19 related to the Introduction).
- A schedule of representations, officers responses and recommended changes to plan is available to view on the District Council's website together with the minutes of the meeting recording the Council's decisions ([www.scambs.gov.uk](http://www.scambs.gov.uk)).



### **Summary of main issues raised:**

- Specific changes to development principles were sought, and a number of representations were concerned with what measures should be required of developers.
- A significant number of representations sought to amend village frameworks, the majority of which were for the purposes of enabling additional development.
- Representations sought amendment to green belt policy to avoid repetition with national guidance. There were also calls for the amendment of green belt boundaries in specific locations.
- On housing, a number of representations objected to the level of affordable housing required in the plan.
- With regard to Economy and Tourism, representations sought amendment to the area covered by the selective management policies. Amendments to specific Established Employment Areas In the Countryside, and changes to the policy wording. Clarification on the tests governing loss of rural employment to non-employment sites was also sought.
- Some representations were submitted seeking changes to the retail hierarchy, others pointed out that this was a strategic policy that should be in the Core Strategy.
- An extension of the Lords Bridge Consultation Area was called for in order to meet the aims of the policy.
- Additional clarification was sought on the mechanism for requiring contributions towards outdoor sport and play space with new developments.
- Representations stated the plan should include the standard for Strategic Open Space developed by the County Council.
- There was some objection to seeking energy efficiency above that required by building regulations, and the requirements for renewable energy provision.
- Broad support for the policies on biodiversity, but some concerns that not all important sites had been identified on the proposals map. Policies on water infrastructure and sustainable drainage systems were supported. Whilst there was some objection to requiring water conservation measures in new developments, clarification was also sought on requirements for a water conservation strategy.
- There were calls for additional protected village amenity areas, and important countryside frontages, as well as amendments or deletions of those published in the draft plan.

### **How were issues addressed:**

A number of changes were made for the Submission DPD, some of the more significant changes include:

- In response to several representations from GO-East (concerned that some policies simply repeated Government Guidance – an approach which is contrary to Planning Policy Statement 12: Local Development Frameworks) some policies were deleted, or incorporated into the text of others, or reworded, including policies in the Green Belt and Natural Environment

chapters, and policies ET/9: Replacement Buildings in the Countryside, SF/8: Telecommunications, CH/3: Listed Buildings and CH/5: Conservation Areas.

- Green Belt boundary reviewed where it has been extended around Northstowe.
- Retail hierarchy policy moved to the Core Strategy DPD.
- Added an extension of the Lord's Bridge Telescope Consultation Area.
- Included the standard for Strategic Open Space.
- Revised proposals map to include additional wildlife sites.
- Biodiversity policies amended to reflect latest government guidance in PPS9.
- Clarified requirements for water conservation strategies with proposals for major developments.
- Additional Important Countryside frontages designated at Over and Histon.
- The remit of Cycling and Walking Provision policy widened to apply to all non-car modes generally, allowing for greater inclusion of horse riders.
- Additional text added to explain the application of policies TR/1: Planning For More Sustainable Travel and TR/3: Mitigating Travel Impact in the Travel Chapter, including the additional requirement for a Transport Statement to accompany applications.
- Deleted policy TR/6: Eastern Rapid Transit as this infrastructure will be either totally within and serving Cambridge East and has is already incorporated in the AAP or will be within the City Council's area.