

Open Spaces in New Developments Supplementary Planning Document

Public Participation Report

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
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Chapter 1 - Introduction to the Supplementary Planning Document

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22119 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships and Gallagher Longstanton Ltd are concerned that there are parts of the SPD which are seeking to create new policy rather than providing greater detail on the policies in adopted DPDs. We are concerned that this approach is in conflict with national guidance. As a consequence such an approach also would not accord with the requirements of an SPD as set out at section 19 of the Planning and Compulsory Purchase Act (2004). English Partnerships and Gallagher Longstanton Ltd are also concerned that the wording of the SPD is too prescriptive. Several examples of this are referred to in our representations.		<p>Many points raised in the objection are addressed against other objections against specific parts of the SPD, and are not repeated here. This includes a number of proposed changes which reflect some of the points raised. Following these changes it is not considered that the plan imposes additional policy that should have been included within a Development Plan Document. It is also necessarily prescriptive in order to provide clear guidance to developers.</p> <p>With regard to the use of standard costs, there use reflects guidance in Circular 05/2005 - 'B33. Formulae and standard charges are quantitative indications of the level of contribution likely to be sought by a local planning authority, through a planning obligation, towards the provision of infrastructure that is necessitated by a new development. Local authorities are encouraged to employ formulae and standard charges where appropriate, as part of their framework for negotiating and securing planning obligations. These can help speed up negotiations, and ensure predictability, by indicating the likely size and type of some contributions in advance. They can also promote transparency by making indicative figures public and assist in accountability in the spending of monies.'</p> <p>It is considered that the formula provided in the SPD meet the requirements of the circular.</p>	No Change.
22174 - Great Shelford Parish Council	Object	This is a useful but quite complex document.		Support noted.	No change.

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22150 - Cambridgeshire County Council	Support	In general support.		Support noted. Specific points are addressed against separate representations.	No Change.
22220 - East of England Regional Assembly	Support	The Regional Planning Panel Standing Committee considered the attached report at the meeting of 27th June 2008 and endorsed the recommendation that: 'The four draft Supplementary Planning Documents prepared by South Cambridgeshire District Council are in general conformity with the RSS.'		Support noted.	No change.
<i>1.2</i>					
22048 - The National Trust	Object	The National Trust regrets that the full hierarchy of green infrastructure has not been considered in the Draft SPD. The highest level of the provision hierarchy i.e. strategic open space, has been ignored in spite of the fact that it will play an important role for the new communities. Three such National Trust properties, Wimpole, Anglesey Abbey and the expanding Wicken Fen, already successfully provide the strategic open space function but all could benefit from improvements to cycling and walking links from the new communities and from open spaces lower down the hierarchy. The National Trust would hope Section 106 funding would be available to help finance the provision of the links and improvements to the facilities provided within the strategic open spaces.	The National Trust regrets that the full hierarchy of green infrastructure has not been considered in the Draft SPD. The highest level of the provision hierarchy i.e. strategic open space, has been ignored in spite of the fact that it will play an important role for the new communities. Three such National Trust properties, Wimpole, Anglesey Abbey and the expanding Wicken Fen, already successfully provide the strategic open space function but all could benefit from improvements to cycling and walking links from the new communities and from open spaces lower down the hierarchy. The National Trust would hope Section 106 funding would be available to help finance the provision of the links and improvements to the facilities provided within the strategic open spaces.	Supplementary Planning Documents cannot introduce new policy, rather they elaborate upon policies in the adopted Development Plan Documents. Policies SF/10 and SF/11 in the Development Control Policies Development Plan Document refer to Outdoor Play Space, Information Open Space and New Developments, and the standards that will be used to calculate contributions from development. Strategic Open Space is not included within the scope of these policies. As a result, Strategic Open Space is beyond the scope of the SPD as has not been included.	No change.

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<i>1.4</i>					
22120 - English Partnerships and Gallagher Longstanton Limited	Object	Paragraphs 1.4 English Partnerships/ Gallagher believe that the use of the word 'visible' in this paragraph is inappropriate. The requirement for children's play areas should be for safety which does not necessarily require that play areas are "overlooked by family homes" (as required by paragraph 4.35 of the SPD). We consider that a requirement for visibility would restrict design solutions, particularly in the case of NEAPs which require a wider buffer zone. English Partnerships/ Gallagher seek the deletion of the word 'visible' from this paragraph to be replaced by 'overlooked to provide natural surveillance'.	English Partnerships/ Gallagher seek the deletion of the word 'visible' from this paragraph to be replaced by 'overlooked to provide natural surveillance'.	Paragraph 1.4 seeks to ensure children's play areas are designed into development proposals and located such that they will be very accessible and visible, and not located in left over unused spaces, for example tucked away in a corner. As such, they should be located within the heart of the development where they would be visible and overlooked, which provides natural surveillance and improves their safety. This is considered a sound element of the SPD.	No change.
22058 - English Heritage	Support	Open space has a vital role in defining townscape - from garden squares and village greens to more formally laid out public parks. We hope that the design and layout of new neighbourhoods will draw on the historically successful examples, which often rely on visual enclosure of space as an integral part of townscape, and use space to define distinct communities.		Support noted.	No change.

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1.5 22033 - University of Cambridge	Object	Greater clarity about the application of this Open Space SPD to Area Action Plans should be provided. Reference is made in the draft SPD to 'a number of Area Action Plans for major developments that contain specific policies on open space that vary from the district wide policy. The relevant Area Action Plans should be specified as all are now adopted or in advanced stages of preparation. It should also be made clear which parts of the SPD (if any) apply to development in the Area Action Plan areas.	i) Specify the Area Action Plans referred to ii) Clarify which parts of the SPD (if any) apply to the Area Action Plan areas	It is agreed that further clarification could be provided.	Add new paragraph after 1.5: "Area Action Plans that address sites on the edge of Cambridge (Cambridge East AAP, Cambridge Southern Fringe AAP, North West Cambridge AAP) utilise the Cambridge City Council Open Space standards. The standards and costs included in chapter 2 of this document therefore do not apply to these area."

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22121 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that the 50:50 split of children's play space between formal and informal proposed in this paragraph is impractical. There is no justification in national policy guidelines for the insistence on 50% of equipped play space. Furthermore this requirement is inconsistent with the Northstowe AAP at paragraph 10.11 which requires that 'up to 50%' [of children's play areas] will be in the form of LAPs, LEAPs, NEAPs and SIPs. When the walk time accessibility standard and the minimum size standard for LAPs, LEAPs and NEAPs are combined with a requirement for equipped play space of 0.4ha per 1000 population, the quantity of play space can be demonstrated to be excessive and unreasonable.		<p>It is the role of this SPD to provide guidance on how the adopted LDF policies should be implemented. It is entirely appropriate to provide guidance on the form the 0.8 hectares of children's playspace should take. The Council's 'Recreation Study - Audit and Assessment of Need for Outdoor Playspace and Informal Open Space in South Cambridgeshire June 2005' (subject to public consultation in November 2004) paragraph 3.39 states, 'This significant shortfall in Formal Children's Playspace, when combined with the accessibility problems outlined above, suggest that it would be sensible to establish a high standard for the provision of Formal Children's Playspace in new developments. The higher figure of 0.8 hectares per 1,000 population is therefore selected. A split between formal and informal should also be maintained at 50% each where appropriate.'</p> <p>The 50/50 split of formal and informal playspace is considered an appropriate starting point for considering the wide range of new developments that will be considered using this SPD, in a situation where provision across the district is relatively poor compared to the LAPS / LEAPS / NEAPS model. It provides a clear point for developing a contributions model for off site provision. 'The Development of a Recreation Policy for South Cambridgeshire District Council' background document used model to calculate the split between the different types of provision in order to calculate costs, rather than advocate a different geographical distribution of the different types of play spaces. Used for this purpose the document is sound.</p> <p>It is acknowledged that 50% may not be required to meet the needs of a new major development, and this is reflected</p>	Amend paragraph 1.11 to read: "The starting point for the mix of Children's Play Space will be 50% formal and 50% informal. A lower percentage of formal space (and consequently higher level of informal children's play space) may be acceptable if it can be demonstrated that provision of the LAPS /LEAPS / NEAPs hierarchy can be achieved appropriately with less than 50% formal provision."

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22122 - English Partnerships and Gallagher Longstanton Limited	Object	Paragraph 1.11 - second sentence The standard to which this sentence refers is the standard for children's play space. Appendix 4 of this SPD is wider and is headed 'Areas and Facilities that do not contribute toward open space standards' and the list of areas and facilities contained in Appendix 4 appears to be a mix of play spaces and open space. English Partnerships/ Gallagher recommend that the references and headings in this paragraph and in Appendix 4 should be consistent.	English Partnerships/ Gallagher recommend that the references and headings in this paragraph and in Appendix 4 should be consistent.	in the Area Action Plan policy. With regard to onsite provision more generally, it is acknowledged that there may be cases where provision of the playspace hierarchy can be achieved with less than 50% of the play space being of the formal variety. A change to the SPD is proposed to reflect this point.	Appendix 4 lists those areas and facilities that do not contribute towards open space standards, which is a collective term referring to those standards listed in paragraph 1.10. The first sentence of paragraph 1.11 refers to a specific standard for Children's Play Space, and by including a cross-reference to Appendix 4 in the subsequent sentence may cause confusion. As a result, the second sentence of paragraph 1.11 should be added to paragraph 1.12.
					Move the second sentence of paragraph 1.11 to form beginning of paragraph 1.12.

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22123 - English Partnerships and Gallagher Longstanton Limited	Object	<p>English Partnerships/ Gallagher believes that this paragraph imposes additional open space standards to those included in Policy SF/11 of the Development Control Policies DPD. The standards in SF/11 relate to the provision of open space associated with residential populations within new communities to benefit the community as a whole, whether residents, the workforce or visitors. Furthermore Policy SF10 quite clearly states that 'all residential development will be required to contribute towards outdoor playing space' and there is no reference to other types of development.</p> <p>It is not the function of an SPD to introduce new policy and to do so would be contrary to government guidance (para 6.1 of PPS12).</p>	English Partnerships/ Gallagher strongly recommend that paragraph 1.13 be deleted from the SPD.	<p>The intention of the paragraph is to highlight the benefits the provision of open space can bring to types of development other than residential. It is not intended to set a specific requirement or standard for provision for non-residential development. It is agreed that this could be clarified by amending the paragraph.</p> <p>In addition, paragraphs 2.1, 2.5 and 2.15 would benefit from further clarification that the contribution mechanism has been put in place to address additional need generated by residential development. The role of formulas in the SPD are to identify contributions that would be sought to mitigate additional need generated by residential development, reflecting policy SF/11 of the adopted Development Control Policies DPD. The requirements are triggered by a net gain in need, which should reflect the nature of the net loss as well as the net gain of dwellings, and should therefore be based on the net increase in occupants rather than simply numbers of dwellings.</p>	<p>Amend paragraph 1.13 to read:</p> <p>"In addition to the standards detailed above, informal open space provision will be encouraged as part of business park, retail and large-scale commercial developments; this is for the benefit and well being of the workforce and also visitors to the site. Any spaces provided should have regard to the nature and location of the development."</p> <p>Amend paragraph 2.1 to read:</p> <p>"When there will be a net increase in the number of occupants as a result of a residential development (calculated according to paragraph 2.7 below). This includes conversions and change of use. It includes bed-sits, flats, sheltered housing and affordable housing."</p> <p>Amend 1st sentence of paragraph 2.5 to read:</p> <p>"Calculation of provision required for a residential development involves establishing the net increase in occupants resulting from a residential development, using an occupancy rate for different property types within the development based on the number of bedrooms."</p> <p>Amend 1st sentence of 2.15 to read:</p> <p>"The level of contribution sought by the Local Planning Authority will be calculated according to the net increase of occupants that will result from a residential development according to the table at paragraph 2.7 above."</p>

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22182 - Cambridge Preservation Society	Object	Where are considerations made in relation to hospital, sheltered housing and similar sites? Such needs to be clarified and adequate green space provisions must be included to ensure safer, healthier and more sustainable living, working etc environments.		Sheltered housing would be addressed by the requirements of residential development.	No change.

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22029 - Wm Morrison Supermarkets Plc	Object	Provision of open space should be fairly and reasonably related in scale to the development. Flexibility should be allowed for off-site provision	Amend paragraph 1.13 to ensure open space fairly and reasonably related to the development, and to allow flexibility with the potential for off-site provision where appropriate.	<p>The intention of the paragraph is to highlight the benefits the provision of open space can bring to types of development other than residential. It is not intended to set a specific requirement or standard for provision. It is agreed that this could be clarified by amending the paragraph.</p> <p>In addition, paragraphs 2.1, 2.5 and 2.15 would benefit from further clarification that the contribution mechanism has been put in place to address additional need generated by residential development. The role of formulas in the SPD are to identify contributions that would be sought to mitigate additional need generated by residential development, reflecting policy SF/11 of the adopted Development Control Policies DPD. The requirements are triggered by a net gain in need, which should reflect the nature of the net loss as well as the net gain of dwellings, and should therefore be based on the net increase in occupants rather than simply refer to dwellings.</p>	<p>Amend paragraph 1.13 to read:</p> <p>"In addition to the standards detailed above, informal open space provision will be encouraged as part of business park, retail and large-scale commercial developments; this is for the benefit and well being of the workforce and also visitors to the site. Any spaces provided should have regard to the nature and location of the development."</p> <p>Amend paragraph 2.1 to read:</p> <p>"When there will be a net increase in the number of occupants as a result of a residential development (details of how this is calculated are provided below). This includes conversions and change of use. It includes bed-sits, flats, sheltered housing and affordable housing."</p> <p>Amend 1st sentence of paragraph 2.5 to read:</p> <p>"Calculation of provision required for a residential development involves establishing net increase in occupants, using an occupancy rate for different property types within the development based on the number of bedrooms."</p> <p>Amend 1st sentence of 2.15 to read:</p> <p>"The level of contribution sought by the Local Planning Authority will be calculated according to the net increase of occupants that will result from a residential development according to the table at paragraph 2.7 above."</p>

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Chapter 2 - Calculating Provision Requirements

2.1

22225 - Longstanton Parish Council	Object	Recreation Study - annex 1. The village population figures are from 2001. While its is recognised that the population will continue to rise, we have increased in size so much since 2001 that we insist upon the use of up-to-date figures. Otherwise, the "50% increase" will likely get missed off later interpretation of the population.		The representation seeks to change a document that was not the subject of the consultation.	No change.
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2.4

22183 - Cambridge Preservation Society	Object	No reference is made to the provision of any indoor sports facilities and commuted sums (ref also Cambridge Horizons Sport Strategy). Will there be a separate SPD?		This SPD addresses implementation of the public open space standards. The requirement for other community facilities is addressed by Development Control Policies DPD Policy DP/4, will be addressed by the Planning Obligations SPD.	No change.
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2.7 22212 - Marshall of Cambridge (Holdings) Limited	Object	There is no evidence to support the assertion that occupancy levels at Cambourne are considered a reasonable proxy from new developments across the district. What evidence that is available suggests that occupancy levels at Cambourne are higher than elsewhere in the district because of the attraction of new housing to younger families at a lower price than similar accommodation in the more mature villages which are the norm across the district. Given that this factor is one of the principal inputs into the calculation a better evidence base is required to inform sound conclusions.		The creation of a formula approach to provision requires a population per dwelling figure to be used. In order to better reflect the nature of a development, that figure must acknowledge that the number of people depends on the size of the dwelling. Many SPD utilise a basic formula, such as number of bedrooms plus one to establish the population of a dwelling. However, it is considered that a more accurate reality based formula provides a fairer approach. The Cambourne survey offers information on how a new development is actually occupied, and is considered the best figure available for this purpose. The 2001 census does not provide sufficient detail to provide an accurate district wide population by dwelling size, although a reasonable estimate can be extrapolated, and this does not differ substantially from the Cambourne figures.	Add to paragraph 2.7: "Where there is alternative robust information on population in relation to a specific major development this will be used subject to the approval of the Local Planning Authority."

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22124 - English Partnerships and Gallagher Longstanton Limited	Object	Use of Cambourne as the model for occupancy rates and sports participation rates is inconsistent with the basis on which the standards for open space have been developed ('The Development of a Recreation Policy for South Cambridgeshire District Council' - October 2005) - recommended standards based on an audit of existing facilities and participation rates across the district set against existing levels of population. Page 1 refers to Cambourne, being unrepresentative of overall patterns of supply and demand throughout the District. It is suggested that when applying standards to major new developments such as Northstowe, the occupancy rates proposed within the planning application and agreed by the District Council are used.	English Partnerships/ Gallagher therefore request the following addition to para 2.7: "Where there is alternative information in relation to a specific development this will be used."	<p>The creation of a formula approach to provision requires a population per dwelling figure to be used. In order to better reflect the nature of a development, that figure must acknowledge that the number of people depends on the size of the dwellings. Many SPD utilise a basic formula, such as 'number of bedrooms plus one' to establish the population of a dwelling. However, it is considered that a more accurate reality based formula provides a fairer approach. The Cambourne survey offers information on how a new development is actually occupied, and is considered the best figure available for this purpose. The 2001 census does not provide sufficient detail to provide an accurate district wide population by dwelling size, and although a reasonable estimate can be extrapolated, and this does not differ substantially from the Cambourne figures.</p> <p>It is acknowledged that in relation to Northstowe detailed work has been carried out to establish demographic projections. A change to the SPD should be made to acknowledge that in relation to major developments work on site specific demographics may be available.</p>	<p>Add to paragraph 2.7:</p> <p>"Where there is alternative robust information on population in relation to a specific major development this will be used, subject to the approval of the Local Planning Authority."</p>

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2.13 22163 - Cambridge Preservation Society	Object	Object to the detailing of the clause as no contributions (such as Section 106 and others) are made to informal off-site Open Space and the Society suggests that payments for such includes not only formal play or sports provisions but also informal and (semi-)natural land i.e. other nearby major and other open spaces and green corridors including country parks and wildlife sites such as the Coton C Reserve, Wandlebury CP, Magog Down, Milton CP, Wicken Fen, Greater Fen etc and others as emerging in near future close to Cambridge but also other villages and settlements within the District where relevant.		The intention of the paragraph is to establish what off-site payments may be used for. In essence they must be used to contribute towards the open space standard described in policy SF/11 of the Development Control Policies DPD. Funding could therefore be used to provide or enhance informal open space according to the definition, and this could be clarified. However, it does not include contributions towards strategic open spaces, as they would not meet the definition provided by the policy.	Amend 2nd and 3rd bullet of paragraph 2.13 to read: "The laying out and construction of land including sport pitches, facilities and equipment for play and / or sport, and informal openspace; The improvement or upgrading of land including sports pitches, facilities and / or equipment for play or sport, and informal openspace;"

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2.14

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22125 - English Partnerships and Gallagher Longstanton Limited	Object	Paragraphs 2.14 to 2.16 English Partnerships/ Gallagher understand that the financial contribution per person required to be made by a developer if the open space and play standards cannot be met on site are based on research contained in 'The Development of a Recreation Policy for South Cambridgeshire District Council' cited earlier. English Partnerships/ Gallagher believe that there are significant flaws in the analysis in that report which call into question all the costs shown in this SPD. English Partnerships/ Gallagher therefore recommend that the proposed contributions per person for Outdoor Sport and for Equipped Children's Play, which cannot be justified by the analysis, should be revised to take into account the comments made on the research report, as set out in Annex A to these representations.	English Partnerships/ Gallagher therefore recommend that the proposed contributions per person for Outdoor Sport and for Equipped Children's Play, which cannot be justified by the analysis, should be revised to take into account the comments made on the research report, as set out in Annex A to these representations.	<p>The original study by Leisure and the Environment was undertaken to develop a mechanism for calculating capital and maintenance costs likely to be required on 2.8 hectares of open space in order to apportion appropriate costs to create a standard formula. A number of assumptions were made in regard to costs, layout and other factors, and the original assessment was done on the basis of information relating to 2005 and in some cases 2003 cost estimates from NPFA and others. It was not the role of this study to alter this standard, which has already been adopted in the Development Control Policies DPD.</p> <p>The main objection from EP / Gallagher's seeks to undermine the overall conclusions by casting doubt on the method of calculation, without proposing an alternative way of estimating requirements and costs. Issues have been raised regarding the team generation rates, and the size of pitches that have been assumed, and the costs that have been used. The objections only criticise the means of assessment, and despite the wording of the proposed change to the plan, make no positive suggestions about a preferred methodology. The points raised have been considered in detail by the Council.</p> <p>Outdoor Sport</p> <p>Team Generation Rates The L&E study calculated Team Generation Rates based on the total population, a methodology criticised by the objector as being contrary to Sport England advice. Sport England (and indeed the Football Association) use Team Generation Rates to estimate the number of pitches required for each age group, so senior pitches are based on Team Generation Rates for the adult</p>	No change.

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				<p>population, etc. In reality there is little or no difference to the overall figure for teams, so long as the basis for the calculation is then applied equally to the overall population. The Team Generation Rates of 1 senior team per 971 people in the whole population is broadly the same as 1 team per 130 people in the adult age group (a figure derived from FA figures using the preferred methodology). Whilst the method used is not described clearly in the L & E report, the methodology is easier to apply to a whole district's population (or that of a particular size of development) when calculating overall requirements, and represents a reasonable approach.</p> <p>Pitch requirements With regard to the issues surrounding teams per pitch raised by the objector, the number of pitches required for each team is not as simple as saying that each team plays at home once every fortnight and each pitch is capable of 2 matches a weekend, therefore every pitch accommodates 4 teams. Pitch need depends on the peak day of use - in Cambridgeshire from evidence available (and used in similar Northstowe calculations) this is both Saturday and Sunday, and not in equal measure. In Northstowe these factors produced the following:</p> <ul style="list-style-type: none"> * 36 senior teams require 12 pitches (average 3 teams per pitch) * 29 junior teams required 13 pitches (average 2.2 teams per pitch) * 26 mini teams require 7 pitches (average 3.7 teams per pitch) * Overall 91 teams require 32 pitches i.e. 2.84 teams per pitch <p>Similarly the geographical distribution of teams particularly in a rural area like South Cambs must be considered - a pitch available in say Linton would be of</p>	

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				<p>no use to a team in Swavesey. The above ratios for Northstowe may if anything be low. The actual ratio between football pitches and teams overall of 2.84 may be more accurate than 2 (in L&E's original) or 4 (in the objection). This correction would impact on the apportionment within the 1.6 hectare sport standard.</p> <p>All senior rugby takes place on Saturday so each pitch is capable of accommodating one match per week (ie two teams per pitch). The cricket assumption already utilises 4 teams per pitch. If the rates were changed, increasing the number of football teams per pitch, it would slightly reduce the football component in the calculation. Allowing for a proportion of pitches to be mini rather than junior, and applying the higher team generation rate would be in the region of 0.79ha rather than 0.98.</p> <p>The impact of the changes could be that using this particular formula approach would not add up to 1.6 hectares. However, given the South Cambridgeshire approach towards avoiding sharing of cricket and football pitches, it could be argued that a higher proportion could be used for cricket. This is an alternative form of grass pitch that would not impact on the resulting costs.</p> <p>Costs A number of assumptions were made in regard to costs, layout and other factors, and the original assessment was done on the basis of information relating to 2005 and in some cases 2003 cost estimates from NPFA and others. It is agreed that one option to keep costs up to date would be to completely revise costs to 2008 costs and methods of construction etc. However, the overall capital cost per person recommended by L&E is directly</p>	

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				<p>in line with calculations undertaken for a number of other local authorities, as described on the Sport England website, and is considered to be reasonable.</p> <p>It should be noted that the capital costs used by L+E to inform the formula are considered low; should capital costs be reviewed to ensure that they truly represent the 2008 costs, they are likely to increase significantly.</p> <p>The objector makes the comment that the actual cost of maintenance of a MUGA / artificial pitch will depend on the type of pitch produced, however, for the purposes of developing a formula for off site contributions, an assumption must be made.</p> <p>Overall it is considered that the study provides a reasonable method of how much of the 1.6 hectares for sport would be used for grass pitches, and how much for other facilities. Amendments to reduce the proportion of some pitch types over another would not significantly alter the costs.</p> <p>Children's Playspace</p> <p>It is the role of this SPD to provide guidance on how the adopted LDF policies should be implemented. It is entirely appropriate to provide guidance on the form the 0.8 hectares of children's playspace should take. The Council's 'Recreation Study - Audit and Assessment of Need for Outdoor Playspace and Informal Open Space in South Cambridgeshire June 2005' (subject to public consultation in November 2004) paragraph 3.39 states, 'This significant shortfall in Formal Children's Playspace, when combined with the accessibility problems outlined</p>	

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				<p>above, suggest that it would be sensible to establish a high standard for the provision of Formal Children's Playspace in new developments. The higher figure of 0.8 hectares per 1000 population is therefore selected. A split between formal and informal should also be maintained at 50% each where appropriate.'</p> <p>The 50/50 split of formal and informal playspace is considered an appropriate starting point for considering the wide range of new developments that will be considered using this SPD, in a situation where provision across the district is relatively poor compared to the LAPS / LEAPS / NEAPS model. It provides a clear point for developing a contributions model for off site provision. 'The Development of a Recreation Policy for South Cambridgeshire District Council' background document used model to calculate the split between the different types of provision in order to calculate costs.</p> <p>It is acknowledged that 50% may not be required to meet the needs of a new major development, and this is reflected in the Area Action Plan policy. With regard to onsite provision more generally, it is acknowledged that there may be cases where provision of the playspace hierarchy can be achieved with less than 50% of the play space being of the formal variety. A change to the SPD is proposed to reflect this point.</p> <p>With regard to the offsite contribution, it is considered that the 50/50 split of formal / informal should remain the starting point. The purpose of the L&E report to determine how much formal playspace should be in the form of LAP / LEAP or NEAP. It is considered that the end result is a sound proportionment, which creates a reasonable cost requirement per person.</p>	

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
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				<p>The representation also criticises the difference in cost between informal children's playspace, and the informal open space, querying why the latter is so much higher. From the definition of informal open space, it encompasses more formal development such as planted areas and meeting places, that would imply a higher cost. It is found that it is charged at a higher rate.</p> <p>It should be noted that the capital costs used by L+E to inform the formula for LEAPs and NEAP's in particular are considered low; should capital costs be reviewed to ensure that they truly represent the 2008 costs, they are likely to increase significantly.</p>	
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<i>2.17</i>					
22126 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend that it should be made clear in this paragraph that the Template for a s.106 Agreement set out in Appendix 7 can only be indicative. Each s.106 agreement will be specific to the development, especially in the case of major new developments such as Northstowe.		It is acknowledged that s106 agreements may vary, but the purpose of this SPD is to provide clear guidance for developers, in doing so simplify and speed up the planning process. A change is proposed to clarify that the actual s106 agreement may vary from the template.	Add to end of paragraph 3.2: "It is acknowledged that this standard template may require revision in relation to the specific circumstances of an application."
<hr/>					
<i>2.18</i>					
22164 - Cambridge Preservation Society	Support	Para 2.18 - ownership: comment that the Society is proud to be one of the local trusts managing 2 large open spaces and other designated wildlife sites accessible to local people of nearby villages and expanding city of Cambridge and to the benefit of wildlife.		Noted.	No change.
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2.20					
22127 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that the requirements set out in these paragraphs are over prescriptive. In the case of Northstowe, a number of options are being investigated for the future ownership and management of the open space and facilities. For example it is inappropriate for the Council to declare in paragraph 2.20 that transfer to a management company "is the Council's least preferred option and will be avoided where possible" as this prejudices the outcome of the investigation of various options for management. English Partnerships/ Gallagher recommend that paragraphs 2.20 and 2.21 are deleted from the SPD.		<p>This SPD must address a wide variety of open spaces in a wide variety of locations. It is acknowledged that there are a variety of ownership and management options. However, the Council's preference for most developments is for them to be managed by a Parish Council or locally accountable community organisation, and it is important that this preference is stated in the SPD.</p> <p>This preference reflects past experience where transfer to management companies has led to difficulties and frustration by local communities.</p>	<p>Amend Paragraph 2.20 to read:</p> <p>"It is strongly advised that in the majority of cases new open spaces and facilities should come under the freehold ownership of the Parish Council or Town Council or a local community organisation or trust that has clear accountability, is properly constituted, represents the best interests of the whole community and appropriate access by the community is guaranteed into perpetuity."</p> <p>Amend Paragraph 2.21 to read:</p> <p>"If a developer, in consultation with the District Council and Parish Council, decides to transfer the site to a management company, the District Council will require appropriate conditions to ensure public accountability, access and appropriate arrangements in the event that the management company becomes insolvent (a developer guarantee)."</p>
2.24					
22165 - Cambridge Preservation Society	Object	Para 2.24 - maintenance sum: comment - suggested is that not only a maintenance sum is established but also may include assets which beyond 10 year maintenance period will generate income and thus better ensure the long-term looking after the site (e.g. freehold of a building which can be let and income generated support a green space).		<p>In major developments a number of methods of future maintenance are being explored.</p> <p>A ten year maintenance period is considered appropriate regarding facilities that directly meet the needs of the development, given the guidance in circular 05/2005.</p>	No change.

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2.25					
22213 - Marshall of Cambridge (Holdings) Limited	Object	If this is a reference to paragraph B18 in annex B of the circular it is a misinterpretation. It is paragraph B19 which refers to circumstances where the intention is that the facilities to be supplied are for wider public use. That paragraph (B19) spells out the general principle that the cost of subsequent maintenance and other relevant expenditure associated with the developers contributions should normally be borne by the body of authority in which the asset is to be vested. Calculation over a period of five years is excessive. A period of one year is appropriate.		It is agreed that paragraph 2.25 and its references to the circular could be clarified. Disagree. 5 years for 'pump priming' is considered a reasonable term which reflects the intentions of Circular 05/2005 paragraph B19. A one-year period is not considered sufficient.	Amend paragraph 2.25 to read: "In accordance with Planning Circular 05/05 (paragraph B18) this 10 year requirement has been reviewed and is considered a fair and balanced approach for new provision predominantly for the benefit of the users of the associated development."
2.26					
22128 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend that Paragraph 2.26 is redrafted to make it clear that pump priming contributions are not required in circumstances covered by paragraph 2.24. As currently drafted, there is the potential for double counting. Furthermore English Partnerships/ Gallagher believe that it is inappropriate to stipulate a 5 year period for payment of pump priming maintenance contributions. Circular 05/2005 at paragraph B19 makes clear pump priming contributions should reflect "the time lag between the provision of the new facility and its inclusion in public sector funding streams or its ability to recover its own costs".	English Partnerships/ Gallagher recommend that Paragraph 2.26 is redrafted by deleting "also" and "for 5 years" in the first sentence and inserting a sentence after this first sentence to read "Pump priming contributions will not be required where a commuted maintenance sum for 10 years is provided (as set out in paragraph 2.24)". In addition the reference in the first sentence to "paragraph 19" should be revised to "paragraph B.19".	It is agreed that the form of Maintenance payments is likely to take one form or the other rather than both in relation to a single facility, therefore paragraph 2.26 could be clarified. However, 5 years for 'pump priming' is considered a reasonable term which reflects the intentions of the circular paragraph B19.	Add to end of paragraph 2.26: "Additional pump priming contributions will not be required where a commuted maintenance sum has been secured as set out in paragraph 2.24." Reference should also be to paragraph 'B'19 of the circular.

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2.28

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
22129 - English Partnerships and Gallagher Longstanton Limited	Object	This paragraph sets out the maintenance contributions required per person which are based upon the findings of the 2005 report 'The Development of a Recreation Policy for South Cambridgeshire District Council'. English Partnerships/ Gallagher believe that this report does not provide credible justification for the cost figures for the reasons set out in Annex A of these representations. In particular, the maintenance contributions for Equipped Play Facilities, which are calculated as a percentage of the capital contribution for such facilities, cannot be justified by the analysis and should be revised.	<p>English Partnerships/ Gallagher recommend that an additional paragraph is inserted after paragraph 2.28 to read:</p> <p>"Standard costs for maintenance contributions from developers (as set out in paragraph 2.28) will not always represent the actual cost in every circumstance particularly where there are specific site circumstances or where maintenance arrangements are put in place on terms which might vary from these standard costs. For example this situation could arise at major development sites if the developer enters into a grounds maintenance contract with a management organisation. Therefore, where clear evidence can be produced to show that the required facilities can be provided or ongoing maintenance works carried out at costs which may differ from the costs shown in paragraph 2.28 of this SPD, whilst still achieving the appropriate, agreed specification then these actual costs should apply."</p>	<p>With regard to the actual costs, this objection only criticises the means of assessment, and despite the wording of the proposed change to the plan, makes no positive suggestions about a preferred methodology. The L&E Report 2005 is considered to provide a reasonable method assessing general maintenance costs.</p> <p>It is acknowledged that there may be circumstances where maintenance arrangements are agreed through negotiation and reflect the actual circumstances of the site. This may be the case in relation to some major developments. However, the use of the formula included in paragraph 2.28 will provide an appropriate mechanism for the majority of sites, and alternative costs should only be used where appropriate justification is provided. It is considered that the approach to the contributions sought could be clarified with changes that better reflect the circular.</p>	<p>Add to end of paragraph 1.2: "The SPD includes standard charges indicating the level of contribution likely to be sought by the Local Planning Authority, as indicated by Planning Circular 05/05 Planning Obligations."</p> <p>Amend 1st sentence of 2.15 to read: "The level of contribution sought by the Local Planning Authority will be calculated according to the net increase of occupants that will result from a residential development according to the table at paragraph 2.7 above."</p> <p>Amend 2.28 to read:</p> <p>"The level of contribution sought by the Local Planning Authority for commuted maintenance will be as follows:</p> <p>Costs are based on research titled 'The Development of a Recreation, Policy for South Cambridgeshire District Council', prepared by consultants Leisure and the Environment in 2005, index linked (Building Cost All-in Tender Price Index) to 1st quarter of 2008. They represent a robust indicator of the level of contribution which will normally be required. If alternative costs were to be sought through negotiation with the Local Planning Authority, clear evidence would need to be produced to the satisfaction of the Local Planning Authority, to show that the required provision could be maintained for the appropriate period whilst still achieving the relevant agreed specification and quality."</p>

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<i>2.29</i>					
22130 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend the following is added at the end of paragraph 2.29: "Equally the parish council or management organisation must accept the transfer of the open space or facility following the successful conclusion of the agreed handover procedure. Appropriate text will need to be included in the provisions and/or schedules of the s106 agreement".	English Partnerships/ Gallagher recommend the following is added at the end of paragraph 2.29: "Equally the parish council or management organisation must accept the transfer of the open space or facility following the successful conclusion of the agreed handover procedure. Appropriate text will need to be included in the provisions and/or schedules of the s106 agreement".	The SPD confirms the need for early discussions between the developers and the Parish Council, in order to ensure that all aspects of the open space provision are fully discussed and agreement reached, including transfer of land. Paragraph 2.29 clarifies that an open space must be appropriately maintained until it is handed over to the managing organization. It is not considered necessary to add the sentence proposed in the representation.	No change.
<i>2.30</i>					
22166 - Cambridge Preservation Society	Object	Para 2.30 - comment - suggest change of first sentence: "Developers are also required to produce as built plans upon completion of features and full maintenance plans for all on-site informal open space, formal outdoors..... " This to ensure proper and usable data is collated to aid smooth and safer management of the various sites.	Suggest change of first sentence: "Developers are also required to produce as built plans upon completion of features and full maintenance plans for all on-site informal open space, formal outdoors..... "	This section addresses off site contributions, therefore the change is not appropriate. The provision of sufficient information regarding new open spaces is addressed in Appendix 1, and a revision is not considered necessary.	No change.

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Appendix 1 - The Development Process

3.1

22175 - Great Shelford Parish Council	Object	The Parish Council's main comment is that it would be very helpful if the DC could run a workshop so that Parish Councils would know how to make useful inputs into Section 106 agreements at an early stage. All too often in the past on large developments the Parish Council has been presented with a fait accompli. It is important the PC should be consulted separately on Section 106 proposals at a very early stage.		Noted. The comment has been passed on to the legal and Development Control team. Again early consultation with the Parish Council is recommended in the SPD.	No change.
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The Process Flow Chart

22131 - English Partnerships and Gallagher Longstanton Limited	Object	Box 4 - 2nd bullet English Partnerships/ Gallagher believe that the requirement to provide a draft s106 Agreement at the point of submission of a planning application is not consistent with guidance on The Validation of Planning Application (ref. CLG: December 2008). This guidance states that a local planning authority may require a statement of 'the proposed heads of terms' to be submitted with the application. Therefore, as currently drafted, this paragraph is in conflict with national guidance and therefore is not in accordance with the requirements of an SPD as set out at section 19 of the Planning and Compulsory Purchase Act (2004).	English Partnerships/ Gallagher therefore recommend that this paragraph is amended so that reference is to the submission of 'a statement of the proposed heads of terms for a s106 agreement' and that reference to 'a draft s106 agreement' as well as the requirements set out in the second bullet point of this Box are deleted.	In order to speed up the planning application process, the SPD enables applicants to understand what the Council will be seeking with regard to s106, and to fill in a draft agreement. It is not a requirement, as made clear by paragraph 3.2 of the SPD, that states that where possible a planning application will be submitted with a draft section 106 agreement. The subsequent paragraph in the flow chart illustrates the process where a draft agreement is not supplied. It is therefore not prescriptive, and not contrary to guidance. It is acknowledged however, that the word 'completed' should not be used in this context, as the s106 information submitted will be a draft rather than a completed agreement.	Amend 1st sentence of paragraph 3.2 to read: "The Planning Application should be submitted where possible with a draft Section 106 Agreement (based on the model agreement, but otherwise with a draft statement of the proposed heads of terms for a s106 agreement)." Amend Box 4 - 2nd bullet to read: "Developer submits a planning application accompanied by a Design and Access Statement along with a draft Section 106 Agreement (based on the model agreement, but otherwise with a draft statement of the proposed heads of terms for a s106 agreement)."
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<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
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Appendix 2 - Detailed Information on What is Required

4.1

22224 - Longstanton Parish Council	Object	<p>Longstanton golf course is a key amenity in the community. The Recreational Study is rather focussed on LAPs, NEAPS, and other acronyms for formal play areas and football pitches, etc. We believe this is wrong. Recreation includes not just publicly funded areas, but also areas to which the public has access.</p> <p>The golf course provides recreation for golfers, and also walking for countless others in the village.</p> <p>We strongly recommend the inclusion of the golf course in the assessment and that you consider the impact of its removal as a community facility.</p>		The representation seeks to change a document that was not the subject of the consultation.	No change.
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4.4

22132 - English Partnerships and Gallagher Longstanton Limited	Object	<p>English Partnerships/ Gallagher believe that it is inappropriate to refer to Cambourne in justification of higher levels of participation in all new developments. Not only is it inconsistent with the basis on which existing standards have been set in the Development Control Policies DPD, but Cambourne cannot be held out as representative of all future new developments. This is confirmed in Page 1 of the report 'The Development of a Recreation Policy for South Cambridgeshire District Council' of October 2005 that refers to Cambourne being unrepresentative of overall patterns of supply and demand throughout the District.</p>	English Partnerships/ Gallagher therefore recommend that this paragraph is deleted from the SPD.	Disagree. The paragraph provides an example of participation rates in the district. It is not used to justify the standard, as this has already been adopted through the Development Control Policies DPD. It is included for information and should be retained in the document.	No change.
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4.6					
22133 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that the reference in this paragraph to "more local facilities such as swimming pools, artificial turf pitches and sports halls" is misleading in the context of the development of a sub-regional tariff. The reference to local facilities should be deleted; or the distinction between what is local and what is strategic should be clarified to avoid confusion over double counting of developer contributions.	English Partnerships/ Gallagher therefore request the following text be deleted: 'The Strategy also identifies the need for more local facilities such as swimming pools, artificial turf pitches and sports halls within the major growth areas' and request that the following sentence after 'development of a sub regional tariff for strategic sports facilities' be added: 'These will be clearly identified as appropriate to the sub-region as opposed to being for the needs of local residents'.	The operation of a tariff approach, and what elements of infrastructure it would cover, has yet to be established. The queries raised highlight that it should not be referenced in this SPD in advance of this work.	Delete last 2 sentences of 4.6.
4.9					
22134 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend that "Artificial Turf Pitches on school sites" should be included within the standard for formal outdoor sports provision. At the end of para 4.9 we therefore request the additional text: 'Conversely, Artificial Turf Pitches will be included within the standard for community provision'	At the end of para 4.9 we therefore request the additional text: 'Conversely, Artificial Turf Pitches will be included within the standard for community provision'	Appendix 4 of the document establishes that facilities in educational ownership where community use is secured through written agreement can be included. A change to this paragraph is not required.	No change.
22184 - Cambridge Preservation Society	Support	School pitches should not be overused to the detriment of provisions for the school and the overall local community.		Support noted.	No change.

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4.13					
22135 - English Partnerships and Gallagher Longstanton Limited	Object	This paragraph stipulates that pitches should not overlap, e.g. by locating football pitches on the outfield of cricket pitches. English Partnerships/ Gallagher believe that this is contrary to NPFA guidance in the Six Acre Standard, and contrary to the approach adopted by consultants Leisure and the Environment in the report of October 2005 on which the Council have relied to define the developer contributions toward outdoor sports facilities.	The second and third sentences of this paragraph should be deleted and the following sentence inserted "It may be 'desirable' to avoid pitch sharing but it is recognised that in some circumstances overlapping of pitches is acceptable in the interests of an economic and efficient use of land, downstream maintenance costs and other wider objectives that developments have to meet".	There are increasing levels of difficulty being experienced across the District in relation to overlap of pitches between summer and winter sports due to the playing seasons overlapping in late spring and late summer; playing seasons have extended at both start and end. This paragraph of the SPD provides clear reasoning why the overlap of pitches should be avoided in order to avoid conflict and promote good practice. A minor amendment is proposed.	"Pitches should not overlap as the summer and winter seasons now increasingly present potential conflict between sports at the end of each season; for example cricket and football pitches where seasons overlap."
22185 - Cambridge Preservation Society	Object	Support the good management and design principles as suggested but needs to include more space for the pitch so that it can be adjusted to prevent excessive wear and tear at the goal mouth - i.e. needs at least an additional width of goal mouth to ensure quality provision and truly sustainable pitch maintenance.		A 50% allowance for run off and safety margins (which is included in the calculations) would allow pitches to be moved slightly from time to time, to overcome these issues. This also needs to be combined with quality construction for new pitches and good management and maintenance regimes to ensure that damage to vulnerable areas of the pitch is kept to a minimum.	No change.
4.22					
22186 - Cambridge Preservation Society	Object	The Society objects to flood lighting of pitches adjacent or within the Green Belt and Conservation Areas as such is adverse to the setting of the Green Belt and Conservation Areas. This needs to be clarified.		The Council's policy with regard to lighting is included within the Development Control Policies DPD, and appropriately addresses impact on surrounding areas. Additional policy in this SPD is not required.	No change.

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4.35 22136 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that the use of the word 'overlooked by family homes' in this paragraph is inappropriate. The requirement for children's play areas should be for safety which does not necessarily require that play areas are "overlooked by family homes". We consider that this requirement for being overlooked would restrict design solutions, particularly in the case of NEAPs which require a wider buffer zone. English Partnerships/ Gallagher seek the deletion of the word 'overlooked by family homes to provide informal surveillance' from this paragraph to be replaced by 'overlooked to provide natural surveillance'.	English Partnerships/ Gallagher seek the deletion of the word 'overlooked by family homes to provide informal surveillance' from this paragraph to be replaced by 'overlooked to provide natural surveillance'.	<p>Paragraph 4.35 seeks to ensure children's play areas are designed into development proposals and located such that they will be very accessible and visible, and not located in left over unused spaces, for example tucked away in a corner. As such, they should be located within the heart of the development where they would be visible and overlooked, which provides natural surveillance and improves their safety. The Council's preference is for Children's Play Areas to be overlooked by family housing, and this is reflected in the SPD.</p> <p>It is noted however that NEAP's can create greater levels of noise and require the larger buffer zone to help minimise the potential for noise pollution and disruption to residential property. The safety of young people using NEAP's is of paramount importance and it is expected that such facilities will be used unsupervised by an adult parent or guardian.</p> <p>As such, the requirement for NEAPs is that they should either be overlooked by family homes to provide informal surveillance based on the appropriate buffer zone requirement, or, located in "busy" areas where there is considerable natural surveillance and footfall throughout daylight hours.</p>	"They should be sited in open, welcoming locations and where possible and appropriate overlooked by family homes to provide informal surveillance. It is noted however that NEAP's can create greater noise levels and disturbance to residential property therefore the requirement for NEAP's is that they should either be overlooked by family homes or located in "busy" areas where there is considerable natural surveillance and footfall."

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4.36

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
22137 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that the 50:50 split of children's play space between formal and informal proposed in this paragraph is impractical. There is no justification in national policy guidelines for the insistence on 50% of equipped play space. Furthermore this requirement is inconsistent with the Northstowe AAP at paragraph 10.11 which requires that 'up to 50%' [of children's play areas] will be in the form of LAPs, LEAPs, NEAPs and SIPs. When the walk time accessibility standard and the minimum size standard are combined with a requirement for equipped play space of 0.4ha per 1000 population, the quantity of play space can be demonstrated to be excessive and unreasonable.	Therefore English Partnerships/ Gallagher strongly recommend that the last sentence of this paragraph is deleted.	<p>It is the role of this SPD to provide guidance on how the adopted LDF policies should be implemented. It is entirely appropriate to provide guidance on the form the 0.8 hectares of children's playspace should take. The Council's 'Recreation Study - Audit and Assessment of Need for Outdoor Playspace and Informal Open Space in South Cambridgeshire June 2005' (subject to public consultation in November 2004) paragraph 3.39 states, 'This significant shortfall in Formal Children's Playspace, when combined with the accessibility problems outlined above, suggest that it would be sensible to establish a high standard for the provision of Formal Children's Playspace in new developments. The higher figure of 0.8 hectares per 1,000 population is therefore selected. A split between formal and informal should also be maintained at 50% each where appropriate.'</p> <p>The 50/50 split of formal and informal playspace is considered an appropriate starting point for considering the wide range of new developments that will be considered using this SPD, in a situation where provision across the district is relatively poor compared to the LAPS / LEAPS / NEAPS model. It provides a clear point for developing a contributions model for off site provision.</p> <p>It is acknowledged that 50% may not be required to meet the needs of a new major development, and this is reflected in the Area Action Plan policy. With regard to onsite provision more generally, it is also acknowledged that there may be cases where provision of the playspace hierarchy can be achieved with less than 50% of the play space being of the formal variety. A change to the SPD is proposed to reflect this point.</p>	Delete paragraph 4.36.

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4.37					
22138 - English Partnerships and Gallagher Longstanton Limited	Object	A wider buffer zone for skateparks and informal MUGAs follows the guidance in the NPFA Six Acre Standard for a minimum of 30m, although a greater distance may be needed where purpose-built skateboarding facilities are provided. Nevertheless English Partnerships/ Gallagher believe that to stipulate a specific distance (80-100m) for informal MUGAs is too restrictive, particularly in urban locations, such as a town parks. No such requirement is placed on formal MUGAs. It is noted at Northstowe, the Council is seeking to locate formal MUGAs at community centres in the heart of residential areas.	Therefore English Partnerships/ Gallagher recommend that the table at Paragraph 4.37 is revised by deleting the reference to informal MUGA's in row 5 column 5 of the table. Furthermore we request that the end of the 'Distance' footnote to the Table in paragraph 4.37 be amended by adding after "busy roads or junctions" except where defined safe crossing points are provided. This will be the case in particular in urban areas where there are also likely to be speed restrictions."	The recommendation of 80 -100m buffer is from SCDC Environmental Health team relating to informal MUGA's or Ball Courts (basketball etc). This is a recommendation based on rural areas where background noise levels are low. The SPD should be revised to say that this is the recommended buffer zone distance for skate parks and informal MUGA's or Ball Courts in the villages of South Cambs. It is acknowledged that such facilities in more urban areas, may not require the same buffer zone. It is acknowledged that in urban areas there may be a need to cross busy roads, but it should only be considered appropriate for Neap's, and only where safe footpaths and crossing points are provided at the same time. The aim should remain to provide spaces where there is no need to cross a busy road ensuring child safety and maximizing the opportunities for children and young people to access play facilities without adult supervision.	Amend paragraph 4.37: Amend table referring to NEAP: "80m -100m for skate parks and informal MUGA's (for rural areas)." Add to end of the paragraph referring to distance: "The only exception to this may be for NEAP's, where defined safe crossing points are provided at the same time."
22187 - Cambridge Preservation Society	Object	Add that play areas should not be provided on split sites and not divided by a busy road or cycleway etc to ensure safer design solutions.		The issue is noted, but the SPD establishes the need for a network of safe play spaces. References to play spaces split by busy roads is not necessary.	No change.
4.46					
22188 - Cambridge Preservation Society	Object	Benches / seating - consider antisocial behaviour and improve description of bench design; also play areas should have a degree of sunlight and also some shade.		Play areas and shade is addressed by 4.46. The words "robust and low maintenance" be added to description of benches.	Amend 1st bullet of 4.46: Robust and low maintenance benches with arm and back rests to aid older or less mobile carers;

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22139 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher consider this paragraph to be too prescriptive. It contradicts the sentiment in paragraph 4.44 of the SPD that the "LPA will encourage the provision of innovative approaches to play facilities"; and it is unnecessary given the requirements of paragraphs 4.47 and 4.48. English Partnerships/ Gallagher recommend that paragraph 4.46 is deleted.	English Partnerships/ Gallagher recommend that paragraph 4.46 is deleted.	Disagree. The purpose of the guidance is to clarify what SCDC expects to see on new play spaces. This has the benefit of establishing expectations from the outset. It would weaken the SPD if guidance was not provided.	Amend 1st sentence of 4.46 to read: "All play areas will be expected to provide each of the following unless clear evidence is produced to demonstrate why any particular facility or item should be omitted."
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<i>4.47</i>					
22189 - Cambridge Preservation Society	Object	Add also reference for safer surfacing to relevant BS.		EN1177 relates to safety surfacing. The SPD has been revised to clarify.	Revise paragraph 4.47 to read : "All play equipment must meet the most recent and relevant BS and EN standards including BS EN 1176 for playground and equipment design and installation and BS EN 1177 for impact attenuating surface testing and performance plus any further BS EN amendments and subsequent standards."
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<i>4.49</i>					
22191 - Cambridge Preservation Society	Object	Paras 4.49 to 4.77 - add that play areas for all ages should have natural surveillance and a good degree of overlooking to prevent / reduce anti-social behaviour; play areas should be integral to development and village centres etc not positioned at most furthest edge to most of the new and nearby existing communities.		The point is noted, but is adequately addressed by paragraph 1.4 of the SPD.	No change.
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4.50					
22140 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend that the words "On such developments, it is anticipated that Design Codes will provide the framework for a coordinated approach to the design and delivery of LAPs" be added to the end of this paragraph.	English Partnerships/ Gallagher recommend that the words "On such developments, it is anticipated that Design Codes will provide the framework for a coordinated approach to the design and delivery of LAPs" be added to the end of this paragraph.	Agreed.	Add the following to the end of paragraph 4.50: "On large developments, Design Codes can provide the framework for a coordinated approach to the design and delivery of LAPs."
22190 - Cambridge Preservation Society	Object	Add to "planting and natural features" also "the provision of tactile features (such as boulders etc)"; all fencing should be sturdy and long-lived.		It is agreed that LAPs could include tactile features, and this should be referenced in the paragraph.	Amend third sentence of paragraph 4.50: "Rather they will use landscaping, planting and natural features and will offer a variety of paved and grass surfaces and tactile features."
4.72					
22141 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend that the following text is added to the end of the first bullet point in this paragraph "except where defined safe crossing points are provided. This will be the case in particular in urban areas where there are also likely to be speed restrictions"	English Partnerships/ Gallagher recommend that the following text is added to the end of the first bullet point in this paragraph "except where defined safe crossing points are provided. This will be the case in particular in urban areas where there are also likely to be speed restrictions"	It is acknowledged that in urban areas there may be a need to cross busy roads to get to some high order facilities, but it should not be appropriate for informal playspace. Such playspaces should be provided in housing areas to avoid the need for children to cross busy roads. This is appropriately reflected in paragraph 4.72 of the SPD.	No change.

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<i>4.74</i>					
22080 - Natural England	Object	<p>We recommend that this section makes reference to the aims of the Cambridgeshire Horizons Green Infrastructure Strategy, the requirements for informal open space identified within PPG 17 and Natural England's Accessible Natural Greenspace Standards (ANGSt). The ANGSt standards provide a set of benchmarks for ensuring access to places of wildlife interest. These standards recommend that people living in towns and cities should have:</p> <ul style="list-style-type: none"> * an accessible natural greenspace less than 300 metres (5 minutes walk) from home; * statutory Local Nature Reserves at a minimum level of one hectare per thousand population; * at least one accessible 20 hectare site within two kilometres of home; one accessible 100 hectare site within five kilometres of home; and one accessible 500 hectare site within ten kilometres of home. 	<p>We recommend that this section makes reference to the aims of the Cambridgeshire Horizons Green Infrastructure Strategy, the requirements for informal open space identified within PPG 17 and Natural England's Accessible Natural Greenspace Standards (ANGSt).</p>	<p>The SPD provides guidance on how the open space standards in the adopted Development Control Policies DPD should be implemented, and this section addresses the informal open space element of the policy. It would not be sound to add references to an alternative standard through this SPD.</p>	No change.
22079 - Natural England	Support	<p>We strongly support the requirement identified in paragraphs 4.74 to 4.77 for the provision of informal open space within new development.</p>		Support noted.	No change.
<i>4.78</i>					
22153 - Cambridgeshire County Council	Object	<p>The Green Infrastructure Strategy should be referenced as technical guidance, as this shows the main green corridors that Northstowe and the urban extensions should be helping develop.</p>		<p>It is agreed that links to the Green Infrastructure Strategy could be highlighted.</p>	<p>Add to end of paragraph 4.78: "They will help support the vision of the Cambridgeshire Green Infrastructure Strategy to create a comprehensive and sustainable network of green corridors."</p>

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22081 - Natural England	Object	Paragraphs 4.78 and 4.79 are disappointing and again should make reference to the Cambridgeshire Green Infrastructure Strategy. These sections could also set out in more detail the multi-functional value of green corridors and their huge potential benefit to wildlife, even on a small scale. However, it would be prudent within these paragraphs to highlight the importance of the quality (in addition to quantity) of green space provision and the need for appropriate maintenance in order to optimise those multi-functional benefits. A network of green corridors can also provide a valuable link between town and country; a useful publication and reference to this is The Countryside In and Around Towns: A vision for connecting towns and country in the pursuit of sustainable development (CA 207).	Paragraphs 4.78 and 4.79 are disappointing and again should make reference to the Cambridgeshire Green Infrastructure Strategy.	Issues raised in the representation go beyond implementation of the open space standards provided by SF/10 and SF/11 of the Development Control Policies DPD. Issues will also be addressed by the Landscape SPD, the Biodiversity SPD, and the District Design Guide.	Add to end of 4.78: "They will help support the vision of the Cambridgeshire Green Infrastructure Strategy to create a comprehensive and sustainable network of green corridors."
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4.79 22151 - Cambridgeshire County Council	Support	<p>It is not unusual for public rights of way to cross open space. Where they do, land use proposals must prevent conflict; e.g. do not allow football pitches to be marked out over the line of a path.</p> <p>It should be bourn in mind that the requirements and options differ between footpaths and bridleways on the one hand and byways on the other. Apart from other things, the latter carry vehicular rights and adjustments can only be made thorough the magistrates' court.</p>		The issue regarding public rights of way is noted, and a change to the SPD is suggested.	Add to end of paragraph 4.15: "It is not unusual for public rights of way to cross open space. When locating sports pitches, consideration should be given to preventing conflicts."

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4.82					
22083 - Natural England	Object	The provision of insufficient greenspace can encourage car use and have direct impacts on biodiversity. We feel it is important to highlight, within the main body of this SPD, the need to provide sufficient accessible Greenspace to prevent inappropriate or over-capacity use of existing sites such as those designated for nature conservation.		The point raised is noted, but the purpose of the SPD is to provide guidance on the implementation of the existing open space policies.	No change.
22154 - Cambridgeshire County Council	Object	There is an incorrect reference to the Biodiversity Checklist / Action Plan. The Cambridgeshire & Peterborough Biodiversity Partnership, not Cambridgeshire County Council, produced this.		Agree.	Amend 3rd sentence of 4.82 to read: "Further guidance can be found in the Biodiversity checklist / Action Plan produced by Cambridgeshire & Peterborough Biodiversity Partnership."
22082 - Natural England	Support	Natural England supports the message in paragraph 4.82 that "It is vital that open space provision, as part of the landscape scheme, maximises the biodiversity of the site by the inclusion of native species and the creation and retention of a variety of habitats." Reference might also be made here to the following web link: A space for nature www.english-nature.org.uk/special/greenspace/		Support noted. The web link refers back to English Nature recommended standards, which are not the subject of this SPD.	No change.

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Appendix 3 - Definitions

Outdoor Play Space

22142 - English Partnerships and Gallagher Longstanton Limited	Object	<p>English Partnerships/ Gallagher believe that the 50:50 split of children's play space between formal and informal proposed in this appendix (under b. Children's Play Space) is impractical. There is no justification in national policy guidelines for the insistence on 50% of equipped play space. Furthermore this requirement is inconsistent with the Northstowe AAP at paragraph 10.11 which requires that 'up to 50%' [of children's play areas] will be in the form of LAPs, LEAPs, NEAPs and SIPs. When the walk time accessibility standard and the minimum size standard for LAPs, LEAPs and NEAPs are combined with a requirement for equipped play space of 0.4ha per 1000 population, the quantity of play space can be demonstrated to be excessive and unreasonable.</p>	<p>Therefore English Partnerships/ Gallagher strongly recommend that the last sentence of the definition of Children's Play Space at b) of this Appendix is deleted.</p>	<p>It is the role of this SPD to provide guidance on how the adopted LDF policies should be implemented. It is entirely appropriate to provide guidance on the form the 0.8 hectares of children's playspace should take.</p> <p>The 50/50 split of formal and informal playspace is considered an appropriate starting point for considering the wide range of new developments that will be considered using this SPD, in a situation where provision across the district is relatively poor compared to the LAPS / LEAPS / NEAPS model. It provides a clear point for developing a contributions model for off site provision. 'The Development of a Recreation Policy for South Cambridgeshire District Council' background document used model to calculate the split between the different types of provision in order to calculate costs, rather than advocate a specific geographical distribution of the different types of play spaces. Used for this purpose the document is sound.</p> <p>It is acknowledged that 50% may not be required to meet the needs of a new major development, and this is reflected in the Area Action Plan policy. In this case the AAP policy clearly takes precedence over the district wide guidance in this SPD. With regard to onsite provision more generally, it is acknowledged that there may be cases where provision of the playspace hierarchy can be achieved with less than 50% of the play space being of the formal variety. A change to the SPD is proposed to reflect this point.</p>	<p>Amend Appendix 3 definition of outdoor playspace to read:</p> <p>"Children's Play Space - Designated areas for outdoor play for children and young people. This will contain a range of facilities and an environment that has been designed to provide focused opportunities for outdoor play. This includes formal equipped play areas and provision for teenagers including wheeled sports parks and macadam kick-about areas. It also includes areas for informal play, including grass kick-about areas within housing developments."</p>
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<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
<i>Informal Open Space</i>					
22192 - Cambridge Preservation Society	Object	Definition: Informal Open Space - should not include any odd unusable green patches.		The intention is agreed, but it is considered that the SPD includes sufficient guidance on the quality requirements of open spaces.	No change.

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
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Appendix 4 - Definitions : Areas and Facilities That Do Not Contribute Towards Open Space Standards

Areas that will not be considered

22152 - Cambridgeshire County Council	Object	There has been discussion, relating to Northstowe and elsewhere, on whether the area covered by public rights of way should be subtracted from the open space area figure when calculating required provision. It is suggested that where usage does not conflict this is not necessary. This position is taken, at least in part, to avoid the possibility of an offer of a new bridle route, for example, being withdrawn to maintain open space to house number ratio.		<p>The SPD is clear that land used for road-side verges and other small or narrow incidental areas of land should not be included in the standard. Where the primary focus of a very linear corridor of land is a movement corridor, the same principle should apply.</p> <p>There are separate policies relating to the provision of footpaths and bridleways, in particular policy TR/4 of the Development Control Policies DPD.</p>	No change.
22143 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher are concerned that 'Greenways' are not defined in this SPD and as a consequence there is the potential for confusion between 'Greenways' as described in this Appendix and 'Green Corridors' as described at paragraph 4.78. In circumstances set out in paragraph 4.78 and 4.79 the whole of the Greenway would count toward the open space standard, even though the footpath or cycleway could be described as a green corridor. Further, national guidance (PPG17 - Annex paragraph 2) identifies green corridors as "open spaces that may be of public value" and therefore it is not in accordance with the advice of PPG 17 to exclude green corridors or green ways from contributing towards Open Space Standards.	English Partnerships/ Gallagher therefore recommend that Bullet Point 6 of the Definition - Land Used for Greenways is deleted from this Appendix.	<p>Disagree. Where a site provides an informal open space function, it can be included. This may be the case with a green corridor, where a wider area of land is included which performs an informal open space function.</p> <p>The definition of a greenway highlighted in this appendix is intended to highlight that where land takes the form of a landscaped path, it should not be included. It is only where a useable informal open space is provided as part of that corridor should it be included. A Green Corridor is a larger area of land that performs a wider function. A change is proposed to clarify the distinction.</p>	<p>Amend 6th Bullet to read:</p> <p>"Land used for Greenways (off highway landscaped paths), since their principal purpose is that of a movement corridor. This is distinct from a Green Corridor, which comprises open land, which penetrates into an urban area for amenity and recreation. The only exception to this is that part of a Greenway that passes through an area that is designated in its own right as informal open space."</p>

<i>Representation No.</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>Change To Plan Sought</i>	<i>Council's Assessment</i>	<i>Change To Draft SPD</i>
22147 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that this definition is not sufficiently precise to distinguish such areas from open space areas with multi functional use. Informal areas of open space can be multi functional, providing a facility for recreation as well as for nature conservation (see NAAP paragraph D11.2) and should reasonably count toward the public open space standard. Paragraph 4.82 of the SPD provides further support for the notion of multi use of open space. Therefore multi functional areas should count toward open space standards.	Therefore English Partnerships/ Gallagher recommended that a clearer and narrower definition is provided for ecology areas which do not contribute to open space standards.	Where public access to an area is discouraged it is entirely reasonable not to count it towards the open space standards provided by policy SF/11, as it will not meet the definitions provided in the notes to the policy. Multifunctional sites may include specific areas which benefit ecology, but they will still be able to meet the definition provided by note 3 of policy SF/11, as they are designed for use by people. A change to the SPD is not necessary.	No change.
22145 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that the exclusion of allotments is inconsistent with PPG17, where 'allotments' are included in the typology of open space uses defined in the annex (paragraph 2 vii). Using Northstowe as an example the technical case that the allotments at Northstowe should be counted as part of the provision of informal open space is as follows: PPG 17 includes a definition of open space which expands the definition contained in the Town & Country Planning Act 1990 where it is defined as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground.	English Partnerships/ Gallagher therefore recommend that Bullet Point 13 of the Definition - Allotments is deleted from this Appendix.	Disagree. Allotments are not included within the standard defined in policy SF/11 and addressed by the SPD. They were not included in the audit that lead to the open space standards, as detailed in paragraph 2.24 of the South Cambridgeshire Recreation Study, they are therefore an additional community facility. Allotments are a community facility that will be sought separately under the terms of Development Control Policies DPD policy DP/4. This was highlighted by the inclusion of allotments in the list of community facilities included in the Submission Northstowe AAP, although the entire list was deleted as a result of the Examination. The loss of this list form the plan does not change the general approach to allotments.	No change.

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22146 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher believe that "Water bodies" should not be excluded as contributors toward informal public open space as this would be in conflict with national guidance (PPG17 - paragraph 1 of the Annex). Furthermore with respect to Northstowe, the Northstowe Area Action Plan acknowledges at paragraph D11.2 that a "water park will also allow the creation of a diverse environment to provide both a visual and recreation (our emphasis) amenity for the residents of the new town and surrounding villages as well as opportunities for biodiversity." It is accepted that in the absence of sports facilities, water bodies may not be counted as outdoor sports facilities.	English Partnerships/ Gallagher therefore recommend that Bullet Point 14 of the Definition - Water Bodies is deleted from this Appendix.	In many cases the primary function of a water bodies is drainage, and the recreation function is limited. Water bodies would be land intensive but not provide a function that met the requirements of the policy defined in policy SF/11. Water bodies should only be counted where they provide an interactive feature that enables formal sports activities.	No change.
22144 - English Partnerships and Gallagher Longstanton Limited	Object	Car Parking areas have been included in Appendix 4 as non contributors to outdoor play space standards. If this is the intention then English Partnerships/ Gallagher believe that in the context of a sustainable new community such as Northstowe, it is incongruous to propose a policy that disadvantages car parks that serve a dual purpose, for example as a shopper's car park combined with a facility for users of a sports hub. For instance if a car park exclusively for the use of the sports hub counts as a contributor to public open space, a shared car park should have some open space value.	English Partnerships/ Gallagher therefore recommend that Bullet Point 10 of the Definition - Car Parking Areas is revised to state "car parking areas that are not to serve an open space use".	The benefits of dual use of parking are acknowledged. However, the danger is that a large car park serving a wider function that also benefits an open space, could be included as counting towards the standard if the wording suggested by the objector was utilised. The scale of such a car park could go significantly beyond what would be required to serve an open space, and as a result reduce the amount of land actually provided for open space uses. It is agreed that the first sentence of Appendix 4 should be reworded.	Amend first sentence of Appendix 4: "The following are areas that will not be considered as contributing to the open space quantitative standard."
22176 - Great Shelford Parish Council	Support	We are very pleased that sundry small areas of land are no longer to be included in the open space total. This will ensure open space is usable and not just an amalgam of roadside verges.		Support noted.	No change.

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Appendix 5 - Further Information

Local Information

22155 - Cambridgeshire County Council	Object	A reference to the Green Infrastructure Strategy, Biodiversity Checklist / Action Plan and SCDC Biodiversity Strategy should be added.		Agreed.	Appendix 5 - Add reference to the Green Infrastructure Strategy, Biodiversity Checklist / Action Plan and SCDC Biodiversity Strategy.
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Appendix 7 - Section 106 Template

The Template

22148 - English Partnerships and Gallagher Longstanton Limited	Object	English Partnerships/ Gallagher recommend that it should be made clear in this Appendix that provides a Template for s.106 Agreement, that this template can only be indicative. Each s.106 agreement will be specific to the development, especially in the case of major new developments such as Northstowe.		Circular 05/2005 states, 'Local planning authorities are encouraged to use and publish standard heads of terms, agreements / undertakings or model clauses wherever possible in the interest of speed.' The template provided in appendix 7 is intended to reflect this purpose. However, it is agreed that complex applications and situations may require deviations from this standard template. A change has been proposed to paragraph 3.2 in response to a previous representation.	No change.
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