Appendix B

Schedule of responses to the Housing Shortfall Main Document

Site Specific Policies - Responding to a Housing Shortfall

Public Participation Report

Chapter 1 - Purpose Of This Document

1.1

Representations

Nature Representation Summary

Council's Assessment

Chapter 1 - Purpose Of This Document

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community in South Cambs. At the same time it has a statutory obligation to conform with the requirements of higher order plans. Both the Council and the Inspectors will consider all the comments received during this consultation and if necessary amendments will be made to the

Representations	Nature	Representation Summary	Council's Assessment
22576	Object	The old airfield at Oakington will successfully destroy and swallow up the surrounding villages adjoining this proposed site. Is there no limit to the so-called experts appetite to cover more and more green sites in the southeast. Why not repopulate the so called depressed areas in the north or does this government want to increase the population in the south until we have as many unemployed in the south as we now have in the north. I fully realise the complete futility of answering or "the public having their say" as normally it has proved completely useless.	South Cambridgeshire District Council must prepare a Local Development Framework (LDF) comprising a number of Development Plan Documents (DPDs) that set out policies and proposals for the development and use of land in the district and include proposals for development to meet targets set in higher order plans. The Council is well advanced in producing an LDF for the district having now a number of DPDs adopted including the Core Strategy DPD (adopted January 2007) and the Development Control Policies DPD (adopted July 2007). The Core Strategy DPD requires provision of 20,000 new homes in South Cambridgeshire during the period 1999 to 2016. This was the target set for the District in the Cambridgeshire and Peterborough Structure Plan 2003, which includes a strategy for the development of the Cambridg Sub-Region. This strategy focuses development in and on the edge of Cambridge through a number of urban extensions to the city and at the new town of Northstowe. The strategy also allow for limited development to meet local needs in Rural Centres and other villages. This strategy was confirmed in the East of England Plan published by the Government in May 2008. As part of the LDF the Council has also produced a number of Area Action Plans (AAP) for major developments, which include policies specific to these developments. Those that are already adopted are Northstowe AAP; Cambridge Southern Fringe AAP and Cambridge East AAP. A further AAP for North West Cambridge is currently at public examination. The Respondent is concerned that further land for housing is being allocated without consideration of the implications of the impact of this on the District and on Cambridge City. The strategic housin targets took account of environmental impacts and infrastructure requirements in broad terms. Th documents making up the LDF include policies requiring the provision of infrastructure necessary meet the needs of each residential development as well as policies that protect and enhance existing settlements and the needs

Council's proposals.

Representations	Nature	Representation Summary	Council's Assessment
22573 22591 22915	Object	Concern about further housing being allocated in South Cambridgeshire when there is already so much development proposed for this District. Objecting to more housing in the Cambridge area, which will result in loss of green land. More housing will result in more people and in more congestion within the District, which does not have the infrastructure to cope with this increased population. Other regions should be considered for the increased housing.	South Cambridgeshire District Council must prepare a Local Development Framework (LDF) comprising a number of Development Plan Documents (DPDs) that set out policies and proposals for the development and use of land in the district and include proposals for development to meet targets set in higher order plans. The Council is well advanced in producing an LDF for the district having now a number of DPDs adopted including the Core Strategy DPD (adopted January 2007) and the Development Control Policies DPD (adopted July 2007). The Core Strategy DPD requires provision of 20,000 new homes in South Cambridgeshire during the period 1999 to 2016. This was the target set for the District in the Cambridgeshire and Peterborough Structure Plan 2003, which includes a strategy for the development of the Cambridge Sub-Region. This strategy focuses development in and on the edge of Cambridge through a number of urban extensions to the city and at the new town of Northstowe. The strategy also allows for limited development to meet local needs in Rural Centres and other villages. This strategy was confirmed in the East of England Plan published by the Government in May 2008. As part of the LDF the Council has also produced a number of Area Action Plans (AAP) for major developments, which include policies specific to these developments. Those that are already adopted are Northstowe AAP; Cambridge Southern Fringe AAP and Cambridge East AAP. A further AAP for North West Cambridge is currently at public examination. The Respondents are concerned that further land for housing is being allocated without consideration of the implications of the impact of this on the District and on Cambridge City. The strategic housing targets took account of environmental imp-acts and infrastructure requirements in broad terms. The documents making up the LDF include policies requiring the provision of infrastructure necessary to meet the needs of each residential development as well as policies that protect and enhance existing settlements and

			1.1
Representations	Nature	Representation Summary	Council's Assessment
22539	Object	Objecting to building more houses in this area when more houses will mean more people. There is already a lack of facilities in Sawston - no proper lighting, no public toilet and no community hall where people can meet (without paying).	South Cambridgeshire District Council must prepare a Local Development Framework (LDF) comprising a number of Development Plan Documents (DPDs) that set out policies and proposals for the development and use of land in the district and include proposals for development to meet targets set in higher order plans. The Council is well advanced in producing an LDF for the district having now a number of DPDs adopted including the Core Strategy DPD (adopted January 2007) and the Development Control Policies DPD (adopted July 2007).
			The Core Strategy DPD requires provision of 20,000 new homes in South Cambridgeshire during the period 1999 to 2016. This was the target set for the District in the Cambridgeshire and Peterborough Structure Plan 2003, which includes a strategy for the development of the Cambridge Sub-Region. This strategy focuses development in and on the edge of Cambridge through a number of urban extensions to the city and at the new town of Northstowe. The strategy also allows for limited development to meet local needs in Rural Centres and other villages. This strategy was confirmed in the East of England Plan published by the Government in May 2008.
			As part of the LDF the Council has also produced a number of Area Action Plans (AAP) for major developments, which include policies specific to these developments. Those that are already adopted are Northstowe AAP; Cambridge Southern Fringe AAP and Cambridge East AAP. A further AAP for North West Cambridge is currently at public examination.
			The Site Specific Policies DPD was submitted to the Secretary of State in January 2006, alongside a number of other plans. This DPD was subject to Examination by independent Inspectors in late 2007/ early 2008 who concluded that there was currently only sufficient provision for 17,800 dwellings compared with the requirement for 20,000 dwellings. The inspectors requested the Council put forward its preferred sites for making up this shortfall, having undertaken comparative assessment and sustainability appraisal of site options and further public consultation. The recent consultation forms part of the Council's response to this request.
			The Core Strategy 2007 sets out in Policy ST/2 the preferred sequence for new housing development in South Cambridgeshire. The order of preference is

- * On the edge of Cambridge
- * At the new town of Northstowe
- * In the rural area in Rural Centres and other villages.

In considering which sites to include for assessment the Council had to look at the Objection sites these are sites, which were put forward in representations to the Submission Draft Site Specific Policies DPD. It was agreed with the Inspector that it would be those Objections sites that were on the edge of Cambridge or at a Rural Centre or were otherwise consistent with policy that would be considered for the assessment work. The Council also tested whether there were other reasonable site options consistent with the development sequence that should be assessed.

The Rural Centres are the larger more sustainable villages which generally have a population of at least 3,000 and have good access to a secondary school, employment opportunities, contain a primary school, food shops (including a small supermarket), post office, surgery and have good

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public transport services to Cambridge or a market town. Sawston has been identified as a Rural Centre in Policy ST/4 of the Core Strategy.

Four of the Objection sites are located in Sawston and therefore were considered by the Council along with 31 other Objection sites as potential sites to make up the housing shortfall. The first stage of the assessment considered whether the 35 sites passed fundamental planning considerations such as whether they would be on land liable to flood or were located in the Green Belt. All of the Sawston sites were rejected at this first stage as not being reasonable options for further consideration to make up the housing shortfall. Three are within the Green Belt and one is within zone 2 for flooding where development should only be allocated if it can be demonstrated that there are no reasonably available sites in zone 1 (the lowest flood risk)

The Council is therefore not proposing any new allocations for housing in Sawston as part of this work to identify sites to make up the housing shortfall.

			Chapter 1 - Purpose Of This Document	
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Representations	Nature	Representation Summary	Council's Assessment	
22566	Object	Concerned with sustainable food supplies for the increasing population of the world. UK relies on imported food. Need to be more sustainable in future. Essential to provide food for sustainable communities to maintain all land which is in food production or capable of being used for food production. No permission should be given for other uses. If we are short of 'housing' we need to restrict migration into UK and to build at higher density on land which can not be brought into food production.	South Cambridgeshire District Council must prepare a Local Development Framework (LDF) comprising a number of Development Plan Documents (DPDs) that set out policies and proposals for the development and use of land in the district and include proposals for development to meet targets set in higher order plans. The Council is well advanced in producing an LDF for the district having now a number of DPDs adopted including the Core Strategy DPD (adopted January 2007) and the Development Control Policies DPD (adopted July 2007).	
		brought into rood production.	The Core Strategy DPD requires provision of 20,000 new homes in South Cambridgeshire during the period 1999 to 2016. This was the target set for the district in the Cambridgeshire and Peterborough Structure Plan 2003, which includes a strategy for the development of the Cambridge Sub-Region. This strategy focuses development in and on the edge of Cambridge through a number of urban extensions to the city and at the new town of Northstowe. The strategy also allows for limited development to meet local needs in Rural Centres and other villages. This strategy was confirmed in the East of England Plan published by the Government in May 2008.	
			As part of the LDF the Council has also produced a number of Area Action Plans (AAP) for major developments, which include policies specific to these developments. Those that are already adopted are Northstowe AAP, Cambridge Southern Fringe AAP and Cambridge East AAP. A	

The Site Specific Policies DPD was submitted to the Secretary of State in January 2006, alongside a number of other plans. This DPD was subject to Examination by independent Inspectors in late 2007/ early 2008 who concluded that there was currently only sufficient provision for 17,800 dwellings compared with the requirement for 20,000 dwellings. The Inspectors invited the Council to put forward its preferred sites for making up this shortfall, having undertaken comparative assessment and sustainability appraisal of site options and further public consultation. The recent consultation forms part of the Council's response to this request.

further AAP for North West Cambridge is currently at public examination.

The respondent is concerned that agricultural land is being used for uses other than food production. The Core Strategy DPD 2007 states in paragraph 1.14 the following 'The LDF aims to improve the overall quality of life for residents of South Cambridgeshire in a way which will also benefit future generations. Taking a sustainable approach to economic, social and environmental issues will be at the heart of the plan...' One of the four objectives of the national strategy for sustainable development is 'prudent use of natural resources' and South Cambridgeshire in preparing its LDF has taken into account this objective. A Sustainability Appraisal (SA) has been prepared for all the Development Plan Documents, which includes an assessment of irreversible loss of undeveloped land and productive agricultural holdings. The current work undertaken by the Council in identifying additional sites for housing has all been subject to SA, which was carried out by independent consultants. Their work is outlined in paragraph 7.1 of the Housing Shortfall document and their full report was included in the recent public consultation. The detailed site assessments carried out by the Council considered agricultural land quality with a view to avoiding the use of the best and most productive agricultural land. There is also a focus on the reuse of previously developed land where this is consistent with a sustainable development strategy. Whilst it is not possible to avoid the use of undeveloped land, a holistic approach is taken to the

Representations	Nature Representation Summary	Council's Assessment
		assessment of the impact of development on the full range of sustainability objectives.
		The respondent suggests that if housing is to be built it should be carried out at higher densities. The Council in its adopted Development Control Policies DPD has Policy HG/1 Housing Density which promotes higher density residential development which complies with the national requirements set out in Planning Policy Statement 3. This is in the interests of achieving more sustainable forms of development and reducing use of greenfield land. In the urban extensions to Cambridge and the new town of Northstowe, higher densities are required, compatible with achieving a high quality residential environment.

Representations Nature Representation Summary

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Chapter 2 - Approach to Meeting The Housing Shortfall 2.1

Representations 22868 - D H Barford & Co Limited 22867 - D H Barford & Co Limited 22869

Nature Representation Summary

flawed and unsound.

Object The housing shortfall has increased. The Council's choice of potential sites is limited and may not be the most sustainable options. The selection of sites is fundamentally

The Council proposes to focus on Rural Centres very close to Cambridge - this is not supported in the Core Strategy.

The Council's approach is simplistic and it has not compared the merits of other locations further from the city. It is not based on any robust evidence base and is flawed.

Identifying allocations within selected Rural Centres will not necessarily secure the most sustainable options. Other options within Minor Rural Centres e.g. Gamlingay or even Group Villages e.g. Duxford have not been examined.

Council's Assessment

The Council has identified its preferred locations for additional housing sites following work requested by the Inspectors holding the Examination into the Draft Site Specific Policies DPD.

The Core Strategy Policy ST/2 sets out the preferred sequence for new housing development in South Cambridgeshire and the supporting text emphasises that the strategy is one of concentrating development on Cambridge through a number of urban extensions to the city and at the new town of Northstowe whilst the strategy allows for only limited development to meet local needs in Rural Centres and other villages. This is therefore a change in direction from a more dispersed development strategy historically that resulted in significant levels of development in rural South Cambridgeshire to a more urban focused strategy with only limited rural development at larger villages. This is also consistent with the RSS sequence and Policy CSR1 makes clear that development on the periphery of key service centres would be mainly limited to existing commitments.

The Core Strategy makes clear that there is a hierarchy of rural settlements and the Rural Centres are at the top of that hierarchy and are the most sustainable locations for development. The development sequence is clear that land at Cambridge is the priority for development and that the rural area would only come into play for new peripheral allocations if the housing requirement could not be met at appropriate sites at the top of the search sequence. Notwithstanding, there are a number of Objection Sites (sites put forward in representations by objectors to the Submission Draft Site Specific Policies DPD) at Rural Centres that would provide housing well beyond the numbers required to meet the housing shortfall and as such the Council considered it appropriate that the consideration of reasonable site options did not proceed beyond the Rural Centres.

The Council advised the Inspectors in its letter of 22 April 2008 that it intended to assess all Objection Sites that were on the edge of Cambridge or at a Rural Centre. The Council also advised that it intended to include in its assessment any Objection Sites in other locations where housing development would be consistent with policy, such as Major Developed Sites in the Green Belt. A list of the sites was attached to the letter of 22 April. The Inspectors commented that the list seemed long with some small sites and others within the Green Belt well removed from those where Structure Plan Policy P9/2c indicates that land for development should be considered for release from the Green Belt. The Council retained the long list of sites in order to ensure that a holistic and consistent approach to the comparative assessment and a robust evidence base at this additional stage in the plan making process. The Council has therefore created such an evidence base and the approach taken in assessing all the sites has not been challenged the Inspectors.

The Respondents consider that the Council should not be focusing on the Rural Centres close to Cambridge since this is not supported in the Core Strategy DPD. The Core Strategy sets a clear sequential approach to development and development in the rural area is at the bottom of the sequence. The Core Strategy also sets a rural hierarchy with the emphasis for rural development being located in Rural Centres as the most sustainable location for rural development. In the Technical Annex of The Housing Shortfall document paragraphs TA4.9 - 10 explains why Rural Centres close to Cambridge are considered to be more sustainable than those further away 'The principles underlying the East of England Plan and the strategy for the Cambridge Sub-Region, as originally set out in the Structure Plan and now provided in the Core Strategy, are to focus development at or close to Cambridge in order to address an imbalance in jobs and homes and

Representations Nature Representation Summary Council's Assessment minimise journey times to work, services and facilities. Therefore Rural Centres very close to Cambridge would have some advantages over those further away, particularly because of the opportunities to cycle as well as use public transport.' The assessment of sites carried out by the Council was done using a ranking of settlements showing the distinction between the Rural Centres having regard to location and services and facilities. The Council considers this to be consistent with the existing policies. The Respondents consider that sites further from the city have not been properly considered. They believe that sites in Minor Rural Centres or even Group Villages should have been included in the assessment of sites. However no sites in villages below Rural Centres were assessed since it considered that reasonable alternative site options could be found on the edge of Cambridge and if necessary in the Rural Centres consistent with the development sequence. The Minor Rural Centres by definition have more limited services than Rural Centres, and Group Villages even less. Residential development in these less sustainable locations, other than that provided for by the Core Strategy rural settlement policies, would not be consistent with the sustainable development strategy.

Representations	Nature	Representation Summary	Council's Assessment
22595	Object	The District Council should refuse to develop further housing around Cambridge and should instead identify small pockets of land outside the city. Enlarging with due planning process and thereby enriching some of the small and badly under-serviced rural communities, Harlton and Eversdens, for example, which it protects so carefully from any but minor development for the conspicuously wealthy, might be one alternative solution.	South Cambridgeshire District Council must prepare a Local Development Framework (LDF) comprising a number of Development Plan Documents (DPDs) that set out policies and proposals for the development and use of land in the district and include proposals for development to meet targets set in higher order plans. The Council is well advanced in producing an LDF for the district having now a number of DPDs adopted including the Core Strategy DPD (adopted January 2007) and the Development Control Policies DPD (adopted July 2007). The Core Strategy DPD requires provision of 20,000 new homes in South Cambridgeshire during the period 1999 to 2016. This was the target set for the district in the Cambridgeshire and Peterborough Structure Plan 2003, which includes a strategy for the development of the Cambridge Sub-Region. This strategy focuses development in and on the edge of Cambridge through a number of urban extensions to the city and at the new town of Northstowe. The strategy also allows for limited development to meet local needs in Rural Centres and other villages. This is therefore a change in direction from a more dispersed development strategy historically that resulted in significant levels of development in rural South Cambs to a more urban focused strategy with only limited rural development at larger villages. This strategy was confirmed in the East of England Plan published by the Government in May 2008. The respondents are concerned that so much development is concentrated around Cambridge and that development strategy was for dispersal of the new housing required at the better-served villages across the district. That strategy also restricted the amount of new development to smaller less well-served villages and resulted in increased commuting to Cambridge because the city was where the majority of the employment opportunities were located. The smaller rural settlements away from Cambridge tend to have less facilities thereby meaning people have to commute not just for jobs but for other journeys su
			In strategy does allow for limited development in the smaller settlements in the hierarchy such as Minor Rural Centres or Group Villages but these have been placed lower in the hierarchy due to the more limited facilities available in them. The respondent suggests that Harlton and the Eversdens could be identified for additional housing. These have been identified in the Core Strategy DPD as Infill Villages where development is restricted to not more than 2 dwellings within the village framework (Policy ST/7). The Development Control Policies DPD contains policies to protect existing facilities as well as to promote additional facilities in rural settlements.

Nature Representation Summary

Nature Representation Summ

22895 - Great Shelford Ten Acres Object Limited

Objecting to sites included or not included in assessment carried out by Council. The approach is not supported by strategic policy framework. Site 27 should not have been discounted at Tier 1 stage because neither Core Strategy Policy ST/2 Housing Provision or Policy ST/4 Rural Centres provide policy support for discounting of site 27 at the Tier 1 stage. Removing sites from the list before undertaking the Sustainability Assessment compromises the overall findings of the SA.

Council's Assessment

The Council has identified its preferred locations for additional housing sites following work requested by the Inspectors holding the Examination into the Draft Site Specific Policies DPD.

The Core Strategy Policy ST/2 sets out the preferred sequence for new housing development in South Cambridgeshire and the supporting text emphasises that the strategy is one of concentrating development on Cambridge through a number of urban extensions to the city and at the new town of Northstowe whilst the strategy allows for only limited development to meet local needs in Rural Centres and other villages. This is also consistent with the RSS sequence and Policy CSR1 makes clear that development on the periphery of key service centres would be mainly limited to existing commitments.

The Council advised the Inspectors in its letter of 22 April 2008 that it intended to assess all Objection Sites that were on the edge of Cambridge or at a Rural Centre. The Council also advised that it intended to include in its assessment any Objection Sites in other locations where housing development would be consistent with policy, such as Major Developed Sites in the Green Belt. A list of the sites was attached to the letter of 22 April. The Inspectors commented that the list seemed long with some small sites and others within the Green Belt well removed from those where Structure Plan Policy P9/2c indicates that land for development should be considered for release from the Green Belt. The Council retained the long list of sites in order to ensure that a holistic and consistent approach to the comparative assessment and a robust evidence base at this additional stage in the plan making process.

The Respondent is questioning the approach taken in assessing the final 35 sites identified by the Council. The first stage of the assessment undertaken was to see if the sites passed fundamental planning considerations. These included matters such as the site being located in Flood Zone 2 or 3. or being located in the Green Belt at a Rural Centre. If a site failed any one of these criteria it was not considered to be a reasonable alternative site for development. PPG2 paragraph 2.7 states that "Where existing local plans are being revised and updated, existing Green Belt boundaries should not be changed unless alterations to the structure plan have been approved, or other exceptional circumstances exist, which necessitate such revision". The Structure Plan Policy P9/2c, carried forward into the East of England Plan Policy CSR3, provides the strategic context for a review of the Green Belt around Cambridge this is required by PPG2. It does not propose any change to the Green Belt at Rural Centres. Any such change would therefore only be justifies by other exceptional circumstances. Paragraph D.14 of the Responding to a Housing Shortfall document states that "whilst on the edge of Cambridge, as a matter of principle, it might be possible for there to be such exceptional circumstances because it is at the top of the search sequence. Rural Centres are at the bottom of the search sequence and it is unlikely that there will be exceptional circumstances for releasing land from the Green Belt if there are other suitable sites at Rural Centres on land that is not in the Green Belt. The only possible circumstance where this could arise is if there was a need to look to one of the Rural Centres that is significantly less sustainable than the others, such that it would be appropriate to carry out an assessment of potential Green Belt sites around more sustainable Rural Centres. An assessment of Green Belt sites at Rural centres would therefore only need to be carried out if suitable new allocations could not be found higher up the settlement hierarchy, which has not proven to be the case and no such assessment has been undertaken."

The Respondent's site is located in Green Belt on the edge of Great Shelford, which is a Rural

Representations	Nature Representation Summary	Council's Assessment
		Centre, and therefore it failed this first stage. Sites failing the first tier are not realistic options and by not including them in the next stage the Council did not compromise its assessment work.

Representations Nature Representation Summary 23257 Object We feel that "urban creep" development should be opposed in principle, even if in practical terms it is likely to be accepted. In places like Cambridge, the structure of the city centre is not suitable for the constant expansion at the edges. The developments in progress and planned in the north of the City seem to offer very little: * to the current residents of Cambridge; and * for the retired and elderly. Is it not time that significant public services were located in the north of the City? What about high quality retirement accommodation that would encourage pensioners to downsize and free up large houses for families? If the developments do go ahead, the quality of build and provision of open space should be paramount considerations. Shouldn't quality of life be the most important consideration for planners?

Council's Assessment

South Cambridgeshire District Council must prepare a Local Development Framework (LDF) comprising a number of Development Plan Documents (DPDs) that set out policies and proposals for the development and use of land in the district and include proposals for development to meet targets set in higher order plans.

The Council is well advanced in producing an LDF for the district having now adopted a number of DPDs including the Core Strategy DPD (adopted January 2007) and the Development Control Policies DPD (adopted July 2007).

The Core Strategy DPD requires provision of 20,000 new homes in South Cambridgeshire during the period 1999 to 2016. This was the target set for the district in the Cambridgeshire and Peterborough Structure Plan 2003, which includes a strategy for the development of the Cambridge Sub-Region. This strategy focuses development in and on the edge of Cambridge through a number of urban extensions to the city and at the new town of Northstowe. The principle of urban expansion of Cambridge has therefore been tested at public examination and the principle is established in the policies of the Structure Plan. The strategy also allows for limited development to meet local needs in Rural Centres and other villages. This strategy was confirmed in the East of England Plan published by the Government in May 2008. South Cambridgeshire's plans must be in general conformity with the regional plan.

As part of the LDF the Council has also produced a number of Area Action Plans (AAP) for major developments, which include policies specific to these developments. Those that are already adopted are Northstowe AAP, Cambridge Southern Fringe AAP and Cambridge East AAP. A further AAP for North West Cambridge is currently at public examination.

The Respondents are concerned that further land for housing is being allocated without consideration of the implications of the impact of this on the district and on Cambridge City. The strategic housing targets took account of environmental impacts and infrastructure requirements in broad terms. The documents making up the LDF include policies requiring the provision of infrastructure necessary to meet the needs of each residential development as well as policies that protect and enhance existing settlements and the needs of the existing population within the district. The Council is therefore considering the needs of both the existing and new residents of the district.

The Respondents are particularly concerned that the retired and elderly are provided for in the new developments. In the Development Control Policies DPD Policy HG/2 Housing Mix seeks to ensure that residential developments contain a mix of units providing accommodation in a range of types, sizes and affordability to meet local needs. A proportion of new dwellings should be designed to lifetime mobility standards, which means that they will be adaptable to the changing needs of most households. Open space will also be required to be included in all new residential developments - Policy SF/10 and SF/11.

The Site Specific Policies DPD was submitted to the Secretary of State in January 2006, alongside a number of other plans. This DPD was subject to Examination by independent Inspectors in late 2007/ early 2008 who concluded that there was currently only sufficient provision for 17,800 dwellings compared with the requirement for 20,000 dwellings. The Inspectors invited the Council put forward its preferred sites for making up this shortfall, having undertaken comparative

Representations	Nature	Representation Summary	Council's Assessment
			assessment and sustainability appraisal of site options and further public consultation. The recent consultation forms part of the Council's response to this request.
23211 - RLW Estates	Object	The process being undertaken to address the identified shortfall in housing supply is flawed. The shortfall which has been identified by the Inspectors is significant and therefore	The Council has identified its preferred locations for additional housing sites following work requested by the Inspectors holding the Examination into the Draft Site Specific Policies DPD.
		The process being undertaken to address the identified	The Core Strategy Policy ST/2 sets out the preferred sequence for new housing development in South Cambridgeshire and the supporting text emphasises that the strategy is one of concentrating development on Cambridge through a number of urban extensions to the city and at the new town of Northstowe whilst the strategy allows for only limited development to meet local needs in Rural Centres and other villages. This is also consistent with the RSS sequence.
			The Respondent believes that the Council 's approach to finding sites to meet the housing shortfall was flawed. However it is an approach that the Council considers to be thorough and meets the requirements of the approved strategy for the Cambridge Sub-Region. It is consistent with the work requested by the Inspectors.
			The Respondent argues that if larger housing sites are to be proposed these would be best identified in a revised Core Strategy. The Council is aware that as a result of the new PPS 12 a future Core Strategy DPD will be able to include strategic housing sites. However the Council has been tasked by the Inspectors to consider additional housing sites for inclusion in the Site Specific Policies DPD if this DPD is to be found to be sound. The alternative of not complying with the Inspectors' request and waiting for a new Core Strategy to be prepared would leave the district vulnerable to planning by appeal, which could result in less sustainable forms of development being approved. It is the intension of the Council to review the Core Strategy in parallel with the review process being carried out on the East of England Plan which will determine the strategy for the Cambridge area for the longer term, including the appropriateness of any further new settlements, such as that promoted by the objector at Waterbeach. It would be both inappropriate and premature to review the development strategy at this stage. The Respondent outlines the reason why their site at Waterbeach was not included as an Objection Site to the Site Specific Policies DPD due to its scale and it is entirely reasonable that the Council has not considered this strategic scale development as part of this current shortfall project. The work undertaken by the Council has confirmed that it is possible to address the housing shortfall within the framework of the existing development strategy and other current planning policies (e.g. Major Developed Sites in the Green Belt), without the need to identify new large allocations lower down the search sequence.

Representations	Nature	Representation Summary	Council's Assessment
22541	Object	Thank you for sending us a precis of the South Cambs Local Development Framework and Site Specific Policies Plan. I would like to comment that you have made the best of an unwelcome assignment, but I am glad that I won't live to see its implementation - south east England is becoming one vast suburb inhabited by feckless and miserable people in place of villages that used to foster the community spirit that we all need when bringing up our children. Why not build new houses in squares around a shared garden; thus creating small communities sheltered from the weather and passing traffic as in eighteenth century London?	South Cambridgeshire District Council must prepare a Local Development Framework (LDF) comprising a number of Development Plan Documents (DPDs) that set out policies and proposals for the development and use of land in the district and include proposals for development to meet targets set in higher order plans. The Council is well advanced in producing an LDF for the district having now adopted a number of DPDs including the Core Strategy DPD (adopted January 2007) and the Development Control Policies DPD (adopted July 2007). The Core Strategy DPD requires provision of 20,000 new homes in South Cambridgeshire during the period 1999 to 2016. This was the target set for the district in the Cambridgeshire and Peterborough Structure Plan 2003, which includes a strategy for the development of the Cambridge Sub-Region. This strategy focuses development in and on the edge of Cambridge through a number of urban extensions to the city and at the new town of Northstowe. The strategy also allows for limited development to meet local needs in Rural Centres and other villages. This strategy was confirmed in the East of England Plan published by the Government in May 2008. As part of the LDF the Council has also produced a number of Area Action Plans (AAP) for major developments, which include policies specific to these developments. Those that are already adopted are Northstowe AAP, Cambridge Southern Fringe AAP and Cambridge East AAP. A further AAP for North West Cambridge is currently at public examination. The respondent is concerned that further land for housing is being allocated without consideration of the implications of the impact of this on the district and on Cambridge City. The strategic housing targets took account of environmental impacts and infrastructure requirements in broad terms. The documents making up the LDF include policies requiring the provision of infrastructure necessary to meet the needs of each residential development as well as policies that protect and enhance existing settlements and the

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Chapter 3 - Results of Updating Housing Land Supply

3

22894 - Countryside Properties (Special Projects) Limited

Object

The current economic slowdown should not be ignored (this is supported by paragraph 5.1 of PPS12 which identifies that LPAs should have regard to market conditions). A more flexible approach that recognises more realistic rates of delivery and ensures that sufficient land is identified to meet housing requirements is needed to ensure that the DPD is sound.

The Council is aware of the effect that market conditions are having on development across the district, including at Northstowe. This is reflected in the housing trajectory included in the Council's 2007-2008 Annual Monitoring Report, prepared in consultation with the development industry. Whilst it shows that, based on the best information at the time of production, the shortfall identified by the Inspectors to 2016 is likely to have increased, this is as a result of adverse market conditions. It is important to note that the housing trajectory shows that even with the market effects identified by developers, there is an identified supply for 2001-2021 of 23,652 dwellings, 152 dwellings more than the requirement set out in Policy H1 of the East of England Plan. This does not take account of any new 'windfall' sites that will inevitably be permitted in the remaining years of the plan.

The Council sought clarification from the Inspectors of their intentions in respect of the housing shortfall and they advised on 17 October 2008 that they consider it will be necessary to have an update on the housing supply situation, that is, the result of monitoring since the figures were last given. However, on the basis of their current knowledge, they do not anticipate that the shortfall previously identified will increase. They had received letters from the development industry putting forward the view that the shortfall has increased as a result of market conditions prior to providing that view. They also advised that they are aware of the need to keep in mind the extent of changes that can reasonably be made to the DPD. The Council has therefore carried out the consultation on the understanding that the housing shortfall will not increase for the purposes of completing the examination of the Site Specific Policies DPD.

The Council is concerned to ensure that the urban focused sustainable development strategy is not undermined by a short-term requirement to allocate additional land to meet the housing shortfall. It is therefore appropriate that the additional land allocated meets the housing shortfall but does not go beyond that, if it would involve the allocation of land in unsustainable locations. Allocating additional land would be unlikely to deliver any additional housing in the short term and the effect would be that less sustainable sites would be developed in the longer term. However, it does accept that it is necessary for the plan to provide adequate housing to meet its targets and has therefore complied with the Inspectors' request.

Representations	Nature	Representation Summary	Council's Assessment
22925 - Highways Agency	Object	The Council's housing predictions do not appear to include any risk assessment regarding the current economic downturn in the UK housing market. Moreover the Council has not identified a contingency position regarding the potential slow delivery of any of the projected housing numbers.	The Council is aware of the effect that market conditions are having on development across the district, including at Northstowe. This is reflected in the housing trajectory included in the Council's 2007-2008 Annual Monitoring Report, prepared in consultation with the development industry. Whilst it shows that, based on the best information at the time of production, the shortfall identified by the Inspectors to 2016 is likely to have increased, this is as a result of adverse market conditions. It is important to note that the housing trajectory shows that even with the market effects identified by developers, there is an identified supply for 2001-2021 of 23,652 dwellings, 152 dwellings more than the requirement set out in Policy H1 of the East of England Plan. This does not take account of any new 'windfall' sites that will inevitably be permitted in the remaining years of the plan.
			The Council sought clarification from the Inspectors of their intentions in respect of the housing shortfall and they advised on 17 October 2008 that they consider it will be necessary to have an update on the housing supply situation, that is, the result of monitoring since the figures were last given. However, on the basis of their current knowledge, they do not anticipate that the shortfall previously identified will increase. They had received letters from the development industry putting forward the view that the shortfall has increased as a result of market conditions prior to providing that view. They also advised that they are aware of the need to keep in mind the extent of changes that can reasonably be made to the DPD. The Council has therefore carried out the consultation on the understanding that the housing shortfall will not increase for the purposes of completing the examination of the Site Specific Policies DPD.
			The Council's housing shortfall calculations are based on the best information available, at the time of calculation. The land supply is now being updated to take account of the current position on new planning permissions and applications where the Council has resolved to grant permission subject to a s106 agreement. This will be considered together with the preferred sites to make up the housing shortfall identified by the Inspectors. Again, the current housing shortfall calculations do not take account of any new windfall sites that will inevitably be permitted in the remaining years of the plan, which therefore provide a form of contingency.

Representations Nature Representation Summary Diport Impington Parish Council objects to the entire set of shortfall sites because: 1. The entire forecast of demand is flawed, faulty and misleading: there is no 'shortfall'. 2. Allocating extra land for development will not result in extra housing in the short term. 3. Nominating the sites will result in development occurring up to 2016 in the less desirable sites (or else they would have been included ahead of the currently allocated sites) and leave the desired sites being incompletely developed.

Council's Assessment

The respondent argues that the entire forecast of demand is flawed, faulty and misleading: there is no 'shortfall'. This argument is based on the understanding that the economic growth projections, proposals for Stansted and the M11 corridor, population trends and social trends have all changed since the housing requirements and housing shortfall were calculated.

Core Strategy Policy ST/2 requires the provision of 20,000 new homes in South Cambridgeshire during the period 1999 to 2016 and is the target that the Council must address through the allocation of appropriate sites consistent with the development sequence through the various DPDs comprising the Local Development Framework. This was the target set for the district in the Cambridgeshire and Peterborough Structure Plan 2003, which includes a strategy for the development of the Cambridge Sub-Region. This strategy was confirmed in the East of England Plan, published by the Government in May 2008.

Independent Inspectors have advised the Council that it has not identified sufficient land to meet its housing requirement of 20,000 new homes between 1999 and 2016. They have concluded there is a housing shortfall of 2,200 dwellings that must be made up through new sites if the Council's Site Specific Policies DPD is to be found to be 'sound'. The Inspectors requested the Council put forward its preferred sites for making up this shortfall, having undertaken comparative assessment and sustainability appraisal of site options and further public consultation. The recent consultation forms part of the Council's response to this request.

The Council is aware of the effect that market conditions are having on development across the district, including at Northstowe. This is reflected in the housing trajectory included in the Council's 2007-2008 Annual Monitoring Report, prepared in consultation with the development industry. Whilst it shows that, based on the best information at the time of production, the shortfall identified by the Inspectors to 2016 is likely to have increased, this is as a result of adverse market conditions. Allocating additional land would be unlikely to deliver any additional housing in the short term and the effect would be that less sustainable sites would be developed in the longer term. The Council sought clarification from the Inspectors of their intentions in respect of the housing shortfall and they advised on 17 October 2008 that they consider it will be necessary to have an update on the housing supply situation, that is, the result of monitoring since the figures that were given in the consultation documents. However, on the basis of their current knowledge, they do not anticipate that the shortfall previously identified will increase. They had received letters from the development industry putting forward the view that the shortfall has increased as a result of market conditions prior to providing that view. They also advised that they are aware of the need to keep in mind the extent of changes that can reasonably be made to the DPD. The Council has therefore carried out the consultation on the understanding that the housing shortfall will not increase for the purposes of completing the examination of the Site Specific Policies DPD.

The message from Central Government is that Local Planning Authorities should continue to plan for increased housing in their DPDs in order to ensure that when there is an upturn in the economy there will be adopted plans in place and that planning does not hold up the process of building more houses. A statement issued on the 21 January 2009 on the CLG website from Margaret Beckett, Minister for Housing, states "we are determined to help keep house building going in the current climate, as the long term need for more homes is not going to disappear".

Representations Nature Representation Summary Council's Assessment The respondent is also concerned that based on the current financial climate, allocating additional sites for development will not result in significant new housing in the next year or two (depending on the length of the recession). The respondent also argues that as many of the preferred sites have reduced infrastructure requirements compared to the existing allocated sites, they will inevitably be developed first when the new build housing market returns. The Council is concerned to ensure that the urban focused sustainable development strategy is not undermined by a short-term requirement to allocate additional land to meet the housing shortfall. It is therefore appropriate that the additional land allocated meets the housing shortfall but does not go beyond that, if it would involve the allocation of land in unsustainable locations. The housing shortfall is specifically about ensuring adequate supply in the period to 2016 because of the delays in bringing forward the strategic developments, in particular Northstowe. The delivery rates of the identified and emerging sources of supply used by the Council in the housing trajectory included in the 2007-2008 Annual Monitoring Report, were informed by the adopted Area Action Plans and also information provided by the developers, landowners or agents responsible for the sites.

Nature Representation Summary

22794 - Fulbourn Parish Council Object

22849 - Cambridge Preservation Society 22717 - Girton Parish Council 22545 - Comberton Parish Council 23251 22983 - Histon Parish Council Respondents question the relevance and appropriateness of the housing shortfall in the context of the current economic downturn in the UK housing market. Some argue that the shortfall takes no account that the land already available for development is not being developed because of economic demand and infrastructure costs and there is therefore an extreme unlikelihood that the existing housing allocations will be delivered, even excluding the 'housing shortfall' as consulted on.

Council's Assessment

The respondents are concerned that no account has been taken of the current economic climate where there has been a slow down in building the houses that are already allocated. The Council is obviously aware of this change in the economic situation but unless and until such time as guidance is given by Central Government the Council must continue to take into account the requirement for the Council to allocate sufficient land in its DPDs to meet the housing requirements set out in the Core Strategy and the Inspectors' advice that the Site Specific Policies DPD will be found to be unsound unless changes to include sufficient land to make up the housing deficit they have identified are included in the final DPD.

The message from Central Government is that Local Planning Authorities should continue to plan for increased housing in their DPDs in order to ensure that when there is an upturn in the economy there will be adopted plans in place and that planning does not hold up the process of building more houses. A statement on the DCLG website from Margaret Beckett, Minister for Housing on 21st January 2009 states "we are determined to help keep house building going in the current climate, as the long term need for more homes is not going to disappear...". The Prime Minister has confirmed this need in a response to an 'e-petition' submitted to 10 Downing Street on 30th January 2009 by the homeless and housing charity Shelter.

"...However in the short-term, there are undoubtedly challenges to overcome in the housing market, with global economic and credit supply conditions impacting on the UK market. It is to be expected that these tough market conditions will affect housing supply in the short term, with supply rates likely to be affected in the next year or so. But the fundamental need remains to respond to the long-term increasing demand for homes as our population ages and grows and more people live alone. The Government is responding to the short term market conditions by introducing measures to provide extra help for first time buyers, homeowners facing difficulties, and keeping housing supply, especially affordable housing supply, as high as possible. ...'

The Council is aware of the effect that market conditions are having on development across the district, including at Northstowe. This is reflected in the housing trajectory included in the Council's 2007-2008 Annual Monitoring Report, prepared in consultation with the development industry. Whilst it shows that, based on the best information at the time of production, the shortfall identified by the Inspectors to 2016 is likely to have increased, this is as a result of adverse market conditions. It is important to note that the housing trajectory shows that even with the market effects identified by developers, there is an identified supply for 2001-2021 of 23,652 dwellings, 152 dwellings more than the requirement set out in Policy H1 of the East of England Plan. This does not take account of any new 'windfall' sites that will inevitably be permitted in the remaining years of the plan.

The Council sought clarification from the Inspectors of their intentions in respect of the housing shortfall and they advised on 17 October 2008 that they consider it will be necessary to have an update on the housing supply situation, that is, the result of monitoring since the figures were last given. However, on the basis of their current knowledge, they do not anticipate that the shortfall previously identified will increase. They had received letters from the development industry putting forward the view that the shortfall has increased as a result of market conditions prior to providing that view. They also advised that they are aware of the need to keep in mind the extent of changes that can reasonably be made to the DPD. The Council has therefore carried out the consultation on the understanding that the housing shortfall will not increase for the purposes of completing the

Representations	Nature	Representation Summary	Council's Assessment
			examination of the Site Specific Policies DPD.
			Whilst the respondents are arguing that market conditions mean that no further allocations are necessary, other representations have been received to this consultation by the development industry arguing that there is now a larger shortfall as a result of the market and that additional land should therefore be allocated to make up that larger shortfall. The Council considers that allocating additional land would be unlikely to deliver any additional housing in the short term and the effect would be that less sustainable sites would be developed in the longer term. However, it does accept that it is necessary for the plan to provide adequate housing to meet its targets and has therefore complied with the Inspectors' request.
22781	Object	South Cambs DC has failed to sort out the planning /development of Northstowe over a period of nearly 10 years, narrowly avoiding the loss of planning control of this project. The SCDC planning failure to develop Cambourne as a	Core Strategy Policy ST/2 requires the provision of 20,000 new homes in South Cambridgeshire during the period 1999 to 2016. This is the target that the Council must address through the allocation of suitable, achievable and deliverable sites. That provision includes development at Northstowe and Cambourne consistent with the planning policy framework provided by the Local Development Framework.
		proper township, instead of two disjointed villages, lacking at present sufficient infrastructure.	The Council is aware of the effect that market conditions are having on the delivery of development across the district, including at Northstowe. This is reflected in the housing trajectory included in the Council's 2007-2008 Annual Monitoring Report, prepared in consultation with the development
		In the present economic climate it is impossible to precisely predict any precise delivery dates for housing or infrastructure.	industry. Whilst it shows that, based on the best information at the time of production, the shortfall identified by the Inspectors to 2016 is likely to have increased, this is as a result of adverse market conditions. Allocating additional land beyond that identified as the Inspectors' shortfall would be unlikely to deliver any additional housing in the short term and the effect would be that less sustainable sites would be developed in the longer term. On this basis, the most appropriate solution to make the DPD sound is to allocate additional sites to make up the shortfall identified by the Inspectors, but not to seek to address any potential additional shortfall as a result of market conditions. The Council sought clarification from the Inspectors of their intentions in respect of the housing shortfall and they advised on 17 October 2008 that they consider it will be necessary to have an update on the housing supply situation, that is, the result of monitoring since the figures that were given in the consultation documents. However, on the basis of their current knowledge, they do not anticipate that the shortfall previously identified will increase. They had received letters from the development industry putting forward the view that the shortfall has increased as a result of market conditions prior to providing that view. They also advised that they are aware of the need to keep in mind the extent of changes that can reasonably be made to the DPD. The Council has therefore carried out the consultation on the understanding that the housing shortfall will not increase for the purposes of completing the examination of the Site Specific Policies DPD.

Representations	Nature	Representation Summary	Council's Assessment
3.2			
3.2 23213 - RLW Estates	Object	A realistic assessment of the extent of the shortfall that exists in South Cambridgeshire should consider the delay of at least a year to implementation of development at Northstowe. The contribution from Northstowe by 2016 should be reduced by 650 dwellings, to 3,100. The extent of the shortfall therefore stands at 2,150, even taking into account recent completions in the District. This underlines that meeting the shortfall with unsatisfactory alternative sites is a futile exercise, and that a comprehensive assessment of appropriate growth locations, associated with review of the Core Strategy (either independently or in association with the RSS Review) is the correct approach.	The respondent has suggested that the Council's updated housing shortfall (1,470 dwellings) should be increased by 650 dwellings, to take account of the developers announcement that the commencement of Northstowe has been delayed by at least a year. East of England Plan Policy CSR1 confirms the development sequence set out in the Structure Plan and the Core Strategy, with a focus on Cambridge and the new town of Northstowe. It emphasises that development on the periphery of villages should be 'mainly limited to existing commitments'. It is therefore not anticipated in the strategy that there will be large-scale expansion of villages. The review of the East of England Plan has already started and will determine the new strategy for the period post 2021. The Council is concerned to ensure that the urban focused sustainable development strategy is not undermined by a short-term requirement to allocate additional land to meet the housing shortfall. It is therefore appropriate that the additional land allocated meets the housing shortfall but does not go beyond that, if it would involve the allocation of land in unsustainable locations. It should be noted that there are significant strategic allocations that will continue to provide housing in the period beyond 2016 and there are no policies in the LDF that would constrain development at these locations; these are Northstowe, Cambridge East, and North West Cambridge. The housing shortfall is specifically about ensuring adequate supply in the period to 2016 because of delays in bringing forward the strategic developments, in particular Northstowe. The Council is aware of the effect that market conditions are having on the delivery of development across the district, including at Northstowe. This is reflected in the housing trajectory included in the Council's 2007-2008 Annual Monitoring Report, prepared in consultation with the development industry. Whilst it shows that, based on the best information at the time of production, the shortfall identified by the Inspec
			the housing supply situation, that is, the result of monitoring since the figures that were given in the consultation documents. However, on the basis of their current knowledge, they do not anticipate that the shortfall previously identified will increase. They had received letters from the development industry putting forward the view that the shortfall has increased as a result of market conditions prior to providing that view. They also advised that they are aware of the need to keep in mind the extent of changes that can reasonably be made to the DPD. The Council has therefore carried out the consultation on the understanding that the housing shortfall will not increase for the purposes of completing the examination of the Site Specific Policies DPD.

Nature Representation Summary

Council's Assessment

22801 - Countryside Properties (Special Projects) Limited

Object

We submit that the shortfall is actually 2,515 units which the Council should be seeking to achieve. The Council's proposed recommendations would fail the all three tests of soundness set out in section 5.2 of PPS12. Delivery rates on some of the sites identified in this document and also other allocated sites are not achievable. We consider 400 units as representing a maximum delivery rate and feel that a higher delivery rate at Northstowe is unrealistic and will lead to targets not being met. There's some recognition that Northstowe will not deliver the 3,750 units identified by the Inspectors earlier this year and in the draft Annual Monitoring Report (Nov 2008) this has dropped to 2,450. In our attached table we identify that a more realistic annual delivery rate will result in a reduced overall rate of between 2.000 and 2.400.

The respondent argues that delivery rates on some of the allocated sites, such as Northstowe, are not achievable, and that relying on high delivery rates on a relatively small number of larger sites is unlikely to meet the Council's minimum target for the plan period. The respondent considers 400 dwellings per annum as the maximum delivery rate achievable.

The development strategy set by the Cambridgeshire and Peterborough Structure Plan 2003 and confirmed in the East of England Plan, published in 2008, is an urban focused strategy with a limited number of large-scale developments that provide the most sustainable form of development. The Council has carried forward that strategy into its Core Strategy (adopted in January 2007) and all other DPDs must conform with that strategy. The delivery rates of the identified and emerging sources of supply used by the Council in the housing trajectory included in the 2007-2008 Annual Monitoring Report, were informed by the adopted Area Action Plans and also information provided by the developers, landowners or agents responsible for the sites. The Northstowe AAP housing trajectory includes higher annual development rates in the light of detailed debate on this issue at the Core Strategy and Northstowe AAP examinations and they have therefore been found to be sound by the Inspectors.

The respondent has also suggested that the Council's updated housing shortfall (1,470 dwellings) should be increased by 1,045 dwellings, as the housing trajectory in the 2007-2008 Annual Monitoring Report shows that all sources of supply (identified sites and emerging sites) are only anticipated to provide 18,955 dwellings by 2016 rather than 20,000 dwellings as required by Core Strategy Policy ST/2.

The Council is aware of the effect that market conditions are having on the delivery of development across the district, including at Northstowe. Those same conditions are affecting most development sites in the Cambridge Sub Region, including the respondent's site at Clay Farm, where planning permission was granted subject to the finalisation of a s106 agreement in May 2008. This is reflected in the housing trajectory included in the Council's 2007-2008 Annual Monitoring Report. prepared in consultation with the development industry. Whilst it shows that, based on the best information at the time of production, the shortfall identified by the Inspectors to 2016 is likely to have increased, this is as a result of adverse market conditions. Allocating additional land would be unlikely to deliver any additional housing in the short term and the effect would be that less sustainable sites would be developed in the longer term. It is important to note that the housing trajectory shows that even with the market effects identified by developers, there is an identified supply for 2001-2021 of 23,652 dwellings, 152 dwellings more than the requirement set out in Policy H1 of the East of England Plan. This does not take account of any new 'windfall' sites that will inevitably be permitted in the remaining years of the plan. The Council sought clarification from the Inspectors of their intentions in respect of the housing shortfall and they advised on 17 October 2008 that they consider it will be necessary to have an update on the housing supply situation, that is, the result of monitoring since the figures that were given in the consultation documents. However, on the basis of their current knowledge, they do not anticipate that the shortfall previously identified will increase. They had received letters from the development industry putting forward the view that the shortfall has increased as a result of market conditions prior to providing that view. They also advised that they are aware of the need to keep in mind the extent of changes that can reasonably be made to the DPD. The Council has therefore carried out the consultation on the understanding that the housing shortfall will not increase for the purposes of completing the

Representations	Nature	Representation Summary	Council's Assessment
			examination of the Site Specific Policies DPD.
23276 - D H Barford & Co Limited 23275	Object	The housing land supply shortfall that the Council should be considering is 2,850 dwellings following the further delay in bringing forward Northstowe.	The respondents have suggested that the housing shortfall should be increased from 2,200 dwellings to 2,850 dwellings, to take account of the developers announcement that the commencement of Northstowe has 'slipped' by one year.
			The Council is aware of the effect that market conditions are having on the delivery of development across the district, including at Northstowe. This is reflected in the housing trajectory included in the Council's 2007-2008 Annual Monitoring Report, prepared in consultation with the development industry. Whilst it shows that, based on the best information at the time of production, the shortfall identified by the Inspectors to 2016 is likely to have increased, this is as a result of adverse market conditions. Allocating additional land would be unlikely to deliver any additional housing in the short term and the effect would be that less sustainable sites would be developed in the longer term. It is important to note that the housing trajectory shows that even with the market effects identified by developers, there is an identified supply for 2001-2021 of 23,652 dwellings, 152 dwellings more than the requirement set out in Policy H1 of the East of England Plan. This does not take account of any new 'windfall' sites that will inevitably be permitted in the remaining years of the plan. The Council sought clarification from the Inspectors of their intentions in respect of the housing shortfall and they advised on 17 October 2008 that they consider it will be necessary to have an update on the housing supply situation, that is, the result of monitoring since the figures that were given in the consultation documents. However, on the basis of their current knowledge, they do not anticipate that the shortfall previously identified will increase. They had received letters from the development industry putting forward the view that the shortfall has increased as a result of market conditions prior to providing that view. They also advised that they are aware of the need to keep in mind the extent of changes that can reasonably be made to the DPD. The Council has therefore carried out the consultation on the understanding that the housing shortfall will not increase for the purposes of completing the examination of the

Representations 22515 22517 22518 - Freshwater Estates Limited

Nature Representation Summary

Object

This preoccupation with exact calculation has more to do with the political imperative to appease NIMBY pressures. Although the current LDF is prepared under the now defunct Cambridgeshire & Peterborough Structure Plan, RSS14 became national policy on 12 May 2008 and requires a significant increase in housing provision over the defunct Structure Plan and also makes clear that the numbers are minima. Thus it is inappropriate for the Council to continue taking an approach based on exact calculation of numbers. There should be a surplus of numbers built in to enable flexibility and to comply with National Policy as contained in RSS14.

Council's Assessment

Core Strategy Policy ST/2 requires the provision of 20,000 new homes in South Cambridgeshire during the period 1999 to 2016. This was the target set for the district in the Cambridgeshire and Peterborough Structure Plan 2003. The Structure Plan also set out the strategy for the development of the Cambridge Sub Region: to focus development in and on the edge of Cambridge through a number of urban extensions to the City and at the new town of Northstowe. The strategy also allows for limited development in Rural Centres and other villages to meet local needs. The Structure Plan strategy was confirmed in the East of England Plan, published by the Government in May 2008, and key policies of the Structure Plan remain 'saved' policies.

East of England Plan Policy H1 requires the provision of 23.500 new homes in South Cambridgeshire between 2001 and 2021. The East of England Plan target for South Cambridgeshire for 1999 - 2016 (including two years at the Structure Plan annualised rate) is actually 19,200 dwellings, 800 dwellings less than the Core Strategy target. Policy H1 states that district allocations should be regarded as minimum targets to be achieved, rather than ceilings that should not be exceeded. East of England Plan Policy CSR1 confirms the development sequence set out in the Structure Plan and the Core Strategy, with a focus on Cambridge and the new town of Northstowe. It emphasises that development on the periphery of villages should be 'mainly limited to existing commitments'. It is therefore not anticipated in the strategy that there will be large-scale expansion of villages. The review of the East of England Plan has already started and will determine the new strategy for the period post 2021. The Council is concerned to ensure that the urban focused sustainable development strategy is not undermined by a short-term requirement to allocate additional land to meet the housing shortfall. It is therefore appropriate that the additional land allocated meets the housing shortfall but does not go beyond that, if it would involve the allocation of land in unsustainable locations. It should be noted that there are significant strategic allocations that will continue to provide housing in the period beyond 2016 and there are no policies in the LDF that would constrain development at these locations; these are Northstowe, Cambridge East, and North West Cambridge. The housing shortfall is specifically about ensuring adequate supply in the period to 2016 because of delays in bringing forward the strategic developments, in particular Northstowe.

The Council's housing land supply calculations are therefore based on the following identified sources of supply:

• housing completions;

• housing allocations included in the adopted Area Action Plans:

• 'saved' Local Plan housing allocations;

• draft housing allocations included in the submission draft Site Specific Policies DPD;

 $a \in \phi$ 'estate sized' (9 or more dwellings) planning permissions for housing that are unimplemented or under construction at the time the Council submits its list of preferred sites to the Inspectors; and $a \in \phi$ 'small sites' (less than 9 dwellings) with planning permission for housing that are unimplemented or under construction at the time the Council submits its list of preferred sites to the Inspectors.

The Council's housing land supply calculations are also based on the following emerging sources of supply:

• the Council's preferred sites to make up the housing shortfall; and

• planning applications where a decision to grant planning permission for 9 or more dwellings has

Representations	Nature	Representation Summary	Council's Assessment
			been made and is awaiting the completion of a s106 agreement at the time the Council submits its list of preferred sites to the Inspectors.
			For each of these sources of supply the best information available, at the time of calculation, has been used. For the small sites a discount of 10% has been applied to allow for any that may not come forward.
			Previously, the Council had included a windfall allowance in its housing land supply assessments, which predicted the number of dwellings that could be relied on to come forward on unidentified sites having regard to past trends. However, following the change to government policy on the way housing provision is calculated, a windfall allowance is no longer included. It is therefore entirely appropriate that any new planning permissions on land that is not allocated are taken into account as contributing towards the housing shortfall.
			The Council therefore identified, in the Responding to a Housing Shortfall consultation document and associated Technical Annex document, a further 349 dwellings as potential sources of supply that were in the pipeline at the time the document was published. These sources of supply were not included in the housing shortfall calculations as they had not progressed sufficiently far through the planning process to meet the criteria set by the government for identified sources of supply. The housing land supply is now being updated to take account of the current position on new planning permissions and applications where the Council has resolved to grant permission subject to a s106 agreement. This will be considered together with the preferred sites to make up the housing shortfall identified by the Inspectors.
22690 22696 22620 22606	Object	The recent announcement of a delayed start to development at Northstowe (by at least a year), and the current state of the housing market, mean that we do not believe the residual requirement identified (1,470 dwellings) is correct. A higher figure must be planned for if the plan is to be sound.	The Council is aware of the effect that market conditions are having on the delivery of development across the district, including at Northstowe. This is reflected in the housing trajectory included in the Council's 2007-2008 Annual Monitoring Report, prepared in consultation with the development industry. Whilst it shows that, based on the best information at the time of production, the shortfall identified by the Inspectors to 2016 is likely to have increased, this is as a result of adverse market conditions. Allocating additional land would be unlikely to deliver any additional housing in the short term and the effect would be that less sustainable sites would be developed in the longer term. It is important to note that the housing trajectory shows that even with the market effects identified by developers, there is an identified supply for 2001-2021 of 23,652 dwellings, 152 dwellings more than the requirement set out in Policy H1 of the East of England Plan. This does not take account of any new 'windfall' sites that will inevitably be permitted in the remaining years of the plan. The Council sought clarification from the Inspectors of their intentions in respect of the housing shortfall and they advised on 17 October 2008 that they consider it will be necessary to have an update on the housing supply situation, that is, the result of monitoring since the figures that were given in the consultation documents. However, on the basis of their current knowledge, they do not anticipate that the shortfall previously identified will increase. They had received letters from the development industry putting forward the view that the shortfall has increased as a result of market conditions prior to providing that view. They also advised that they are aware of the need to keep in mind the extent of changes that can reasonably be made to the DPD. The Council has therefore carried out the consultation on the understanding that the housing shortfall will not increase for the purposes of completing the examination of the

Representations	Nature	Representation Summary	Council's Assessment
22946 - Martin Grant Homes Limited 22947 - Harcourt Developments Limited	Object	We object to the Council's assessment of the housing shortfall. The Council's assessment fails to undertake a review of the deliverability or otherwise of the identified sources of supply, including Northstowe. It is our view that even allowing for completions and permissions achieved in the period to end September 2008 that there remains a shortfall of 3,521 dwellings (see attached table 1).	The respondents have suggested that the Council's updated housing shortfall (1,470 dwellings) should be increased by 2,050 dwellings, as the respondents hold the view that 1,700 dwellings is the best that could be delivered by 2016 at Northstowe. This is 2,050 dwellings less than the Inspectors conclusion of 3,750 dwellings at Northstowe by 2016. The respondents have also suggested that the Council have failed to undertake a review of the deliverability or otherwise of the identified sources of supply. The Council is aware of the effect that market conditions are having on the delivery of development across the district, including at Northstowe. This is reflected in the housing trajectory included in the Council's 2007-2008 Annual Monitoring Report, prepared in consultation with the development industry. Whilst it shows that, based on the best information at the time of production, the shortfall identified by the Inspectors to 2016 is likely to have increased, this is as a result of adverse market conditions. Allocating additional land would be unlikely to deliver any additional housing in the short term and the effect would be that less sustainable sites would be developed in the longer term. It is important to note that the housing trajectory shows that even with the market effects identified by developers, there is an identified supply for 2001-2021 of 23,652 dwellings, 152 dwellings more than the requirement set out in Policy H1 of the East of England Plan. This does not take account of any new 'windfall' sites that will inevitably be permitted in the remaining years of the plan. The Council sought clarification from the Inspectors of their intentions in respect of the housing shortfall and they advised on 17 October 2008 that they consider it will be necessary to have an update on the housing supply situation, that is, the result of monitoring since the figures that were given in the consultation documents. However, on the basis of their current knowledge, they do not anticipate that the shortfall previou

23274 - Barratt Strategic

Nature Representation Summary

23272 - Hutchison Whampoa Properties (Europe) Limited 23273 - Great Shelford Ten Acres Limited Object

The housing land supply shortfall that the Site Specific Policies DPD should be considering is 2,348 dwellings, rather than 1,470 dwellings as proposed by the Council. The amended figure has been calculated based on the respondents changes to the expected delivery at Northstowe compared with the housing trajectory included in the Northstowe AAP and revisions to the list of planning permissions included in the April - September 2008 update, including the exclusion of Gypsy & Traveller pitches from overall housing provision.

Council's Assessment

The respondents have suggested that the housing shortfall should be increased from 2,200 dwellings to 2,750 dwellings, to take account of the non-delivery of 550 dwellings at Northstowe between 2008 and 2010 as predicted in the trajectory included in the AAP.

The Inspectors calculation of the housing shortfall already takes account of the changes to the expected delivery at Northstowe from that set out in the adopted AAP, and reflects the Inspectors precautionary approach to the expected annual delivery rates at the end of the plan period.

The respondents have also suggested that the housing land supply update to September 2008 should only result in the deduction of 328 dwellings from the housing shortfall rather than the deduction of 730 dwellings (rounded) as used by the Council.

The housing shortfall of 2,200 dwellings calculated by the Inspectors was based on the housing land supply position as at 31 March 2007. Housing monitoring is undertaken on an annual basis using the 12-month period ending on 31 March. The housing land supply position as at 31 March 2008 identifies provision of 18,361 dwellings, therefore reducing the shortfall to 1,640 dwellings (rounded). The housing land supply update to 31 March 2008 concludes that some 560 dwellings through completions or new planning permissions have already contributed to meeting the housing shortfall.

The shortfall is reduced by a further 170 dwellings (rounded) to 1,470 dwellings (rounded), as a result of updating the housing land supply to show the position as at 30 September 2008. The 170 dwellings consists of new planning permissions granted (82 dwellings) and planning applications where a decision to grant planning permission for 9 or more dwellings has been made and is awaiting the completion of a s106 agreement (86 dwellings).

The Council's March 2008 and September 2008 updates have been calculated on the same basis as that previously used by the Council, which has been accepted as sound by the Inspectors. The Council's deduction of 730 dwellings takes account of 560 dwellings completed or permitted on new sites between 1 April 2007 and 31 March 2008, and 170 dwellings permitted on new sites between 1 April 2008 and 30 September 2008.

Previously, the Council had included a windfall allowance in its housing land supply assessments, which predicted the number of dwellings that could be relied on to come forward on unidentified sites having regard to past trends. However, following the change to government policy on the way housing provision is calculated, a windfall allowance is no longer included. It is therefore entirely appropriate that any new planning permissions on land that is not allocated are taken into account as contributing towards the housing shortfall.

The Council therefore identified, in the Responding to a Housing Shortfall consultation document and associated Technical Annex document, a further 349 dwellings as potential sources of supply that were in the pipeline at the time the document was published. These sources of supply were not included in the housing shortfall calculations as they had not progressed sufficiently far through the planning process to meet the criteria set by the government for identified sources of supply. The housing land supply is now being updated to take account of the current position on new planning permissions and applications where the Council has resolved to grant permission subject to a s106

Representations	Nature	Representation Summary	Council's Assessment
			agreement. This will be considered together with the preferred sites to make up the housing shortfall identified by the Inspectors.
			It is appropriate that Gypsy & Traveller pitches are included in calculations of housing provision. The East of England Plan Single Issue Review on Gypsy and Traveller Accommodation includes a draft policy H4 which states that the provision of Gypsy & Traveller pitches will contribute towards housing provision in the East of England as a whole. This policy has been subject to an examination in public and the Inspectors have not changed this section of the policy. The definitions of Core Output Indicators H2(b) and H4, as published in the Regional Spatial Strategy and Local Development Framework Core Output Indicators - Update 2/2008 (Communities and Local Government, July 2008), also state that permanent Gypsy & Traveller pitches should be counted as part of the overall housing provision.
			It is therefore not necessary to reduce the number of dwellings deducted from the shortfall as a result of updating the housing land supply position to as at 30 September 2008.

Representations	Nature	Representation Summary	Council's Assessment
Chapter 4 - Preferre	ed New S	Sites To Meet The Housing Shortfall	
23252 - Environment Agency	Support	Having previously commented on the shortlist of sites, we are pleased that our comments, with regards to sites which should not be considered for allocation, have been taken on board. We confirm that we are satisfied that the Preferred Sites do not have any environmental constraint that would impact upon their potential delivery.	Support noted.

			4.3
Representations	Nature	Representation Summary	Council's Assessment
4.3			
22514	Object	Minor Rural Centres should also be considered. Linton was wrongly classified on incorrect data due to undue political pressure and should be Rural Centre. Substantial areas of previously developed land are suitable for housing.	political requested by the Inspectors holding the Examination into the Draft Site Specific Policies DPD, areas of which makes clear their view that the site search should accord with the development sequence.
			Core Strategy Policy ST/2 sets out the preferred sequence for new housing development in South Cambridgeshire and the supporting text emphasises that the strategy is one of concentrating development on Cambridge through a number of urban extensions to the city and at the new town of Northstowe whilst the strategy allows for only limited development to meet local needs in Rural Centres and other villages. This is also consistent with the RSS sequence and Policy CSR1 makes clear that development on the periphery of key service centres would be mainly limited to existing commitments.

The Core Strategy DPD makes clear that there is a hierarchy of rural settlements and the Rural Centres are at the top of that hierarchy and are the most sustainable locations for development. The development sequence is clear that land at Cambridge is the priority for development and that the rural area would only come into play for new peripheral allocations if the housing requirement could not be met at appropriate sites at the top of the search sequence. Notwithstanding, there are a number of Objection Sites (sites put forward in representations by objectors to the Submission Draft Site Specific Policies DPD) at Rural Centres that would provide housing well beyond the numbers required to meet the housing shortfall and as such the Council considered it appropriate that the consideration of reasonable site options did not proceed beyond the Rural Centres.

It would therefore be contrary to the development sequence to consider sites in Minor Rural Centres or even settlements lower in the hierarchy since reasonable alternative site options could be found on the edge of Cambridge or at the Rural Centres. Rural settlements were designated on the basis of the range of services available and therefore development within the lower order settlements would be limited to a scale appropriate to the village, which would be less sustainable than in Rural Centres.

Linton is identified as a Minor Rural Centre in Policy ST/5 of the Core Strategy DPD. The Inspectors considered representations by the respondent at the Core Strategy examination seeking its allocation as a Rural Centre and their binding report confirmed its designation as a Minor Rural Centre. In their Binding Report (November 2006) they state in paragraph 5.6 'the decisions on which villages are in each category have not been made on an arbitrary basis, but are based on robust evidence regarding the services and functions of villages'. And also in paragraph 8.5 '.....our overall conclusion is that the choice of Minor Rural Centres is generally appropriate and in accordance with wider policies, with a robust evidence base, and is therefore sound'.

Representations 22901 - Cemex UK Materials Limited

Nature Representation Summary

Object

CEMEX objects to focussing a large quantity of residential development in the form of urban extensions on the edge of Cambridge. Cemex objects to this release of land from the Green Belt around Cambridge when there are opportunities for development of sustainable sites outside the Green Belt. In particular the strategy is incorrect to locate the majority of dwellings (approx 1.580 dwellings by 2016) on the northwestern edge of Cambridge close to Girton. Histon and the edge of Cambridge itself. This will result in uneven development across the district and could result in restricted growth and improvement of smaller settlement

Council's Assessment

The Council has identified its preferred locations for additional housing sites following work requested by the Inspectors holding the Examination into the Draft Site Specific Policies DPD. which makes clear their view that the site search should accord with the development sequence.

Core Strategy Policy ST/2 sets out the preferred sequence for new housing development in South Cambridgeshire. This must be seen in the context of the development strategy for the whole of the Cambridge Sub Region which has a strong Cambridge focus. The development seguence is clear that land within or on the edge of Cambridge is the priority for development, followed by the new town of Northstowe and that the rural area would only come into play for new peripheral allocations if the housing requirement could not be met at appropriate sites at the top of the search sequence. This is therefore a change in direction from a more dispersed development strategy historically that resulted in significant levels of development in rural South Cambridgeshire to a more urban focused strategy with only limited rural development at larger villages. This is also consistent with the RSS sequence and Policy CSR1 makes clear that development on the periphery of key service centres would be mainly limited to existing commitments.

Whilst the Council had originally argued against the release of land from the Green Belt in NW Cambridge between Huntingdon Road and Histon Road, that was in the context of an adequate housing land supply consistent with the development sequence. Now that the Inspectors have identified a housing shortfall, it is appropriate that the Council reconsider its position on sites at the top of the search sequence. The NIAB sector is identified in the Structure Plan in saved policy P9/2c as a location for development. It is for the plan making process to identify how much land should be removed for the Green Belt. Land has already been allocated in the Cambridge Local Plan up to the district boundary. In the context of a housing shortfall, the site assessment process has demonstrated that this is the most sustainable location for development and that land could be released from the Green Belt for development in preference over sites lower down the search sequence. For these reasons the Council identified the NIAB site, in a modified form from that put forward as an Objection Site, as a preferred site for consultation.

Notwithstanding, the Core Strategy makes clear that there is a hierarchy of rural settlements and the Rural Centres are at the top of that hierarchy and are the most sustainable rural locations for development. There are a number of Objection Sites at Rural Centres that would provide housing well beyond the numbers required to meet the housing shortfall. For these reasons, the Council considered it appropriate that the consideration of reasonable site options did not proceed beyond the Rural Centres. This approach has been agreed with the Inspectors.

The respondent identifies Melbourn, which is a Minor Rural Centre and Meldreth, which is a Group Village, as areas where new housing should be promoted. These settlements have fewer facilities than those higher in the development hierarchy and therefore would be less sustainable options for development. The Council did not consider Objection Sites in these categories of settlement as a matter of principle as not being consistent with the development sequence.

The respondent states that the advice given in PPS3 is for growth to be included in rural areas to give choice to communities. The development strategy included in the Core Strategy DPD does allow for an appropriate scale of development within the framework of villages as long as the proposals are consistent with relevant policies within the LDF, recognising in particular their level of

Representations	Nature	Representation Summary	Council's Assessment
			service provision.
			The respondent is concerned that pressure will be put on the facilities in Cambridge by concentrating so much development on the edges. The development strategy was established having regard to the impact on Cambridge but also having regard to the potential of larger developments to bring forward their own new services and communities rather than rely on existing facilities in the established built up area. This would be less achievable with smaller scale developments in the rural area. The documents making up the LDF include policies requiring the provision of infrastructure necessary to meet the needs of each residential development as well as policies that protect and enhance existing communities and the needs of the existing population within the district and in the City. The Council is therefore considering the needs of both the existing and new residents.
			The Council's site assessment has concluded that sufficient land can be identified consistent with the development sequence or with other existing planning policies without the need to identify new land on the edge of villages.

Representations Nature Representation Summary Council's Assessment 22721 - Girton Parish Council Object The Council has identified its preferred locations for additional housing sites following work The conclusion that the sites on the edge of Cambridge are the most sustainable is not supported and indicates a lack requested by the Inspectors holding the Examination into the Draft Site Specific Policies DPD. of will to develop properly sustainable communities in South which makes clear their view that the site search should accord with the development sequence. Cambridgeshire. The parasitical approach of preferring sites in or at the edge of Cambridge, particularly in the Core Strategy Policy ST/2 sets out the preferred sequence for new housing development in South cases of sites 5 and 6, will result in the encroachment of the City towards the necklace villages currently within South Cambridgeshire.

Cambridgeshire. This must be seen in the context of the development strategy for the whole of the Cambridge Sub Region, which has a strong Cambridge focus. The development sequence is clear that land within or on the edge of Cambridge is the priority for development, followed by the new town of Northstowe and that the rural area would only come into play for new peripheral allocations if the housing requirement could not be met at appropriate sites at the top of the search sequence. This is therefore a change in direction from a more dispersed development strategy historically that resulted in significant levels of development in rural South Cambridgeshire to a more urban focused strategy with only limited rural development at larger villages. This is also consistent with the RSS sequence and Policy CSR1 makes clear that development on the periphery of key service centres would be mainly limited to existing commitments.

Whilst the Council had originally argued against the release of land from the Green Belt in NW Cambridge between Huntingdon Road and Histon Road, that was in the context of an adequate housing land supply consistent with the development sequence. Now that the Inspectors have identified a housing shortfall, it is appropriate that the Council reconsider its position on sites at the top of the search sequence. The NIAB sector is identified in the Structure Plan in saved policy P9/2c as a location for development. It is for the plan making process to identify how much land should be removed for the Green Belt. Land has already been allocated in the Cambridge Local Plan up to the district boundary. In the context of a housing shortfall, the site assessment process has demonstrated that this is the most sustainable location for development and that land could be released from the Green Belt for development in preference over sites lower down the search sequence. The assessment took account of the need to maintain Green Belt separation with the necklace village of Girton and concluded that a workable separation could be achieved, understanding that development would extend relatively close to Girton but that Green Belt policy could continue to avoid coalescence. For these reasons the Council identified the NIAB site, in a modified form from that put forward as an Objection Site, as a preferred site for consultation.

The Rural Centres around Cambridge are not being fossilised as is suggested by the respondent. Since the Rural Centres comprise the most sustainable villages there is no strategic constraint to the amount of development or redevelopment of land for housing that can come forward within development frameworks of these settlements provided that the proposals are in accordance with the policies in the Plan. Policy ST/4 Rural Centres does not set a limit on individual scheme sizes provided that adequate services, facilities and infrastructure are available or can be made available as a result of the development.

Representations	Nature	Representation Summary	Council's Assessment
22676 22735 - Cambridgeshire Recycling 22754 22672 22684 22677 22681 22747 22750 22680 22686 22739 22745 22688 22743 22752	Object	The Council's preferred locations of growth to accommodate the significant amount of housing land required does not take into account smaller sites adjacent to development frameworks that together could address the deficit. There are numerous sites, some of which are brownfield, on the edge of existing villages, which are close to the major urban area that can provide a substantial contribution to overall housing needs.	The respondents consider that there are numerous sites on the edge of existing villages, which are close to major urban areas that can provide a substantial contribution to overall housing needs. The Council has identified its preferred locations for additional housing sites following work requested by the Inspectors holding the Examination into the Draft Site Specific Policies DPD, which makes clear their view that the site search should accord with the development sequence. Core Strategy Policy ST/2 sets out the preferred sequence for new housing development in South Cambridgeshire. The development sequence is clear that land within or on the edge of Cambridge is the priority for development, followed by the new town of Northstowe and that the rural area would only come into play for new peripheral allocations if the housing requirement could not be met at appropriate sites at the top of the search sequence. This is therefore a change in direction from a more dispersed development strategy historically that resulted in significant levels of development in rural South Cambridgeshire to a more urban focused strategy with only limited rural development at larger villages. This is also consistent with the RSS sequence and Policy CSR1 makes clear that development on the periphery of key service centres would be mainly limited to existing commitments. The Core Strategy also makes clear that there is a hierarchy of rural settlements and the Rural Centres are at the top of that hierarchy and are the most sustainable rural locations for development. There are a number of Objection Sites at Rural Centres that would provide housing well beyond the numbers required to meet the housing shortfall. For these reasons, the Council considered it appropriate that the consideration of reasonable site options did not proceed beyond the Rural Centres. This approach has been agreed with the Inspectors. Several of the Rural Centres lie in the Green Belt. Paragraph D.14 of the Responding to a Housing Shortfall document explains th

Representations	Nature	Representation Summary	Council's Assessment
22492	Support	In previous submissions I objected to two "objection sites" in Great Shelford, the land behind 34-60 Hinton Way, and the land at Mingle Lane / Hinton Way. I fully support the development sequence proposed by the Council. I consider the application of the sequence to be fair and reasonable and I fully support the Site Specific Policies DPD as a whole. I also fully support the inclusion of the North West Cambridge AAP in the considerations, about which I had already made representations to the Inspectors, and believe this removes a key potential area of "unsoundness".	Support noted.
4.4			
22927 - Highways Agency	Object	The Council has recognised that the existing A14 congestion, together with the imminent construction of the A14 Ellington - Fen Ditton (EFD) Major Scheme constitutes a significant development constraints along the A14 corridor within South Cambridgeshire. However these constraints are not explicitly described.	Paragraph 4.4 explains that the timing and phasing of the A14 Improvements have a significant effect on the number of dwellings to be provided on land between Huntingdon Road and Histon Road by 2016. The site assessments provide further detail on the implications of the A14 improvements, essentially a recognition of Highways Agency advice that no development can come forward on the site until the section of the improvement scheme between the Girton and Milton junctions is completed and operational. Most detailed information is given in the Technical Appendix full site assessment. The Highways Agency has provided a letter to the Council setting out its intention to carry out the central and eastern phases of the improvements in parallel, which results in the completion date of the relevant section of the A14 improvements for the NIAB site being summer 2014 (see Reference Document RD/SSPExam/250). This falls part way between the best and worst case scenarios in the Council's consultation documents.

Nature Representation Summary

Council's Assessment

Table 1 - Addressing the Housing Shortfall

Object

22952 - Martin Grant Homes Limited

22953 - Harcourt Developments

Limited

Our assessment of the housing land supply position as at 30 September 2008 identifies a shortfall of 3,521 dwellings to be met through new allocations [see representations 22946 & 22947].

The Council's suggested additional sites allocations as set out in Table 1 will fail to meet the identified shortfall. Our summary of the availability, suitability and deliverability of the Council's preferred sites is set out in the attached table (table 2). It revises the delivery assumptions for: the Ida Darwin Hospital site, Parcel Q at Orchard Park, the North West Cambridge AAP site, and land between Huntingdon Road, Histon Road and the A14.

Based upon our assessment there remains a minimum 2,916 dwelling shortfall in housing provision for the period from end September 2008 to end March 2016. Accordingly, the Site Allocations DPD is unsound as it fails to plan for housing sites that are deliverable during the plan period to meet the district wide housing requirement.

The Council has responded to the respondents' revised housing shortfall calculations against representations 22946 & 22947.

The Council's responses to the respondents' separate representations on each of the preferred sites sets out its justification for the delivery estimates used in the housing shortfall calculations.

The Inspectors identified housing shortfall is partially a result of their conclusion that housing land supply assessments can no longer include a windfall allowance. A windfall allowance predicted the number of dwellings that could be relied on to come forward on unidentified sites over the remainder of the plan period having regard to past trends. The change to government policy on the way housing provision is calculated was made after the six draft DPDs had been submitted. It is therefore entirely appropriate that any new planning permissions on land that is not allocated are taken into account as contributing towards the housing shortfall and the Council took account of new permissions or resolutions to grant planning permission subject to the completion of a section 106 agreement as at September 2008 in its assessment of provision to address the identified housing shortfall. The Council also identified, in Appendix B of the Responding to a Housing Shortfall consultation document, a further 349 dwellings to demonstrate potential further sources of supply that were in the pipeline at the time the document was published. However these potential sources of supply were not included in the housing shortfall calculations as they had not progressed sufficiently far through the planning process for the Council to have reached a position on the application or to meet the criteria set by the government for identified sources of supply.

The Council's housing shortfall calculations are based on the best information available at the time of calculation. The land supply is now being updated to take account of the current position, including new planning permissions and applications where the Council has resolved to grant permission subject to a s106 agreement since September 2008. This will inform the Council's view on its final preferred sites to make up the housing shortfall and will be considered together with the preferred sites to make up the housing shortfall identified by the Inspectors.

The current housing shortfall calculations do not take account of any new 'windfall' sites that will inevitably be permitted in the remaining years of the plan.

Nature Representation Summary

Council's Assessment

22893 - Countryside Properties (Special Projects) Limited

Object

The attached table compares the Council's assessment of how the housing shortfall will be met with our assessment. We have assumed that the total housing shortfall is the same as the Council's assessment for the purposes of this comparative assessment. However, we propose that the housing land supply shortfall that this DPD should be considering is 2,515 units [see representation 22801]. Our assessment suggests that there is still a considerable shortfall in the region of 498 to 804 dwellings. Further sites are therefore required which are capable of delivering at least 804 dwellings within the Plan period.

The Bourn Airfield site provides a sustainable, deliverable site that can accommodate a range of development options, with delivery of approximately 1,040-1,300 within the Plan period.

The Council has responded to the respondent's revised housing shortfall calculations against representation 22801.

The Council's responses to the respondent's separate representations on each of the preferred sites set out its justification for the delivery estimates used in the housing shortfall calculations. The Council's response to the suitability of Bourn Airfield as an allocation to address the shortfall is addressed against separate representations.

The Inspectors' identified housing shortfall is partially a result of their conclusion that housing land supply assessments can no longer include a windfall allowance. A windfall allowance predicted the number of dwellings that could be relied on to come forward on unidentified sites over the remainder of the plan period having regard to past trends. The change to government policy on the way housing provision is calculated was made after the six draft DPDs had been submitted. It is therefore entirely appropriate that any new planning permissions on land that is not allocated are taken into account as contributing towards the housing shortfall and the Council took account of new permissions or resolutions to grant planning permission subject to the completion of a section 106 agreement as at September 2008 in its assessment of provision to address the identified housing shortfall. The Council also identified, in Appendix B of the Responding to a Housing Shortfall consultation document, a further 349 dwellings to demonstrate potential further sources of supply that were in the pipeline at the time the document was published. However these potential sources of supply were not included in the housing shortfall calculations as they had not progressed sufficiently far through the planning process for the Council to have reached a position on the application or to meet the criteria set by the government for identified sources of supply.

The Council's housing shortfall calculations are based on the best information available at the time of calculation. The land supply is now being updated to take account of the current position, including new planning permissions and applications where the Council has resolved to grant permission subject to a s106 agreement since September 2008. This will inform the Council's view on its final preferred sites to make up the housing shortfall and will be considered together with the preferred sites to make up the housing shortfall identified by the Inspectors.

The current housing shortfall calculations do not take account of any new 'windfall' sites that will inevitably be permitted in the remaining years of the plan.

Representations	Nature	Representation Summary	Council's Assessment
22880 - Hutchison Whampoa Properties (Europe) Limited 22883 - Great Shelford Ten Acres	Object	The respondents argue that a number of the conclusions in table 1 are questionable: * the housing land supply shortfall that the Council should	The Council has responded to the respondents' revised housing shortfall calculations against representations 23272, 23273 & 23274.
Limited 22960 - Barratt Strategic		be considering is 2,348 dwellings, rather than 1,470 dwellings [see representations 23272, 23273 & 23274]; * the Ida Darwin Hospital site (site 11) and the Orchard Park sites (sites 1, 2 & 3) should be deleted from the list of preferred sites; and	The Council's responses to the respondents' separate representations on each of the preferred sites set out its justification for the delivery estimates used in the housing shortfall calculations. The Council's responses to the suitability of the alternative sites identified as allocations to address the shortfall are addressed against the separate representations.
		* the delivery estimates by 2016 for North West Cambridge (site 4) and land between Huntingdon Road, Histon Road and the A14 (site 5/6) should be revised.	The Council's housing shortfall calculations are based on the best information available at the time of calculation. The land supply is now being updated to take account of the current position, including new planning permissions and applications where the Council has resolved to grant permission subject to a s106 agreement since September 2008. This will inform the Council's view
		The respondents have each submitted a revised table 1 showing these changes plus their proposed additional or revised sites to address the housing shortfall. Based on their assumptions, each of the respondents still identifies a housing shortfall of between 690 and 930 dwellings within the plan period.	on its final preferred sites to make up the housing shortfall and will be considered together with the preferred sites to make up the housing shortfall identified by the Inspectors.

Representations	Nature	Representation Summary	Council's Assessment
22903 - Cemex UK Materials Limited	Object	CEMEX notes that there is a worst case scenario which leaves a housing shortfall of 195 dwellings. CEMEX considers that this is not appropriate, as this document is to ensure delivery of sufficient land for housing in the district. The promotion of the preferred sites in its current form is potentially flawed. CEMEX notes that most of the preferred sites set out the delivery of housing up to 2016. This is not in accordance with PPS3, as by the time the DPD is adopted (likely to be 2009), the sites will only provide the delivery of housing for 8 years rather than 15 years. CEMEX considers that reserve housing sites should be identified in the plan which could be developed if allocated sites do not come forward, such as the Melbourn site.	The housing shortfall has been identified by the Inspectors compared with the housing requirement set out in the Core Strategy to 2016, with which other parts of the LDF must comply. The strategy was confirmed in the East of England Plan, published by the Government in May 2008. The East of England Plan covers the period from 2001 to 2021. The East of England Regional Assembly has already started the process of reviewing the plan to extend its coverage to 2031. It will be necessary for the Council to review its Core Strategy to take account of any change in strategy proposed by the revised East of England Plan. The housing trajectory in the 2007-2008 Annual Monitoring Report shows that, based on the best information at the time of production, if the Inspectors were to accept all the Council's draft preferred sites, there is an identified supply for 2001-2021 of 23,652 dwellings, 152 dwellings more than the requirement set out in Policy H1 of the East of England Plan. This reflects the fact that the major developments of Northstowe, Cambridge East and NW Cambridge (between Madingley Road and Huntingdon Road and Histon Road will continue to bring forward housing in the period post 2016. However, it does not take account of any new 'windfall' sites that will inevitably be permitted in the remaining years of the plan. The Council has also produced a housing trajectory that covers a 15-year period from 1 April 2008 to 31 March 2023; this is required by the government to satisfy Core Output Indicator H2(c), as defined in the Regional Spatial Strategy and Local Development Framework Core Output Indicators - Update 2/2008 (Communities and Local Government, July 2008). This housing trajectory is also published in the 2007-2008 Annual Monitoring Report, and shows that there is an identified supply for 2001-2023 of 25,952 dwellings. This is an under performance of 208 dwellings (0.8%) when compared to the calculated requirement for the period; the Council calculated the required provision for 2001-2023 based on two more

Representations No.	Nature	Representation Summary	Council's Assessment
22580 Su		Great news the plans for the development of 20,000 new homes in Cambs. They are badly needed and should be built the soonest possible. Why have these other sites been rejected though? (Fulbourn, Histon and Impington, Cambourne, Edge of Cambridge, Sawston and Great Shelford, Stapleford) Whats wrong with them? Lets hope some more will be considered for development of more homes in the near future. Most people I happen to talk with about the housing issue are for the development of more homes in Cambs. Only the selfish ones and the irrational politicians are against.	Support noted.

Site 1: Parcel L2, Orchard Park, Cambridge Northern Fringe (West)

Object

22610 - Foxton Parish Council 22851 - Cambridge Preservation Society 22875 - Hutchison Whampoa Properties (Europe) Limited 22803 - Countryside Properties (Special Projects) Limited 22571 22896 - Great Shelford Ten Acres Limited 22948 - Barratt Strategic

22984 - Histon Parish Council

This site lies in close proximity to the A14, within the Air Quality Management Area and will be the subject of noise and air pollution. Noise levels adjacent to the A14 would be unacceptable and would provide poor quality of life. It would be wrong for young families especially to breathe nothing but car fumes or to live in homes hermetically sealed against them. The level of carbon emissions from constantly passing traffic would be dangerous to health. It will be some years before the A14 improvements are in

There is no hard shoulder on the A14 at that point, and a vehicle crashing through the flimsy barrier would land on housing at the bottom of the embankment and that is a totally unacceptable risk. There is also an issue of highway capacity in the Orchard Park area.

place to help address these issues.

The proposal for 30 dwellings on such a small site (0.29ha) will result in an extremely high-density development of 103dph, greatly in excess of the guidelines in the Council's policy on housing density (Policy HG/1). The ability to produce a high quality development, which is a desirable place for people to live, given the site's position and the density proposed is questioned, in particular the commercial viability of attracting purchasers to such a dense scheme on the very edge of the City. A more reasonable density calculation of 60dph would result in 17 dwellings on the site.

The issues of noise and air quality are clearly very important issues to be taken into account in allocation of the sites by the A14 for residential use and it is important to ensure that a satisfactory residential environment can be created. Any impact of the alternative form of development on the Air Quality Management Area (AQMA) is also an important consideration. These issues were explored in detail at the recent planning appeal on sites 1 and 2 with the benefit of technical evidence and the Inspector's report concludes that noise levels would be within acceptable limits both indoors and outdoors. The Inspector concluded that the proposal would provide a satisfactory environment in terms of air quality. She also concluded that the scheme itself would have an insignificant impact on air quality and on the AQMA.

Transport issues were also considered at the recent appeal inquiry and the Inspector concluded that residential development of sites 1 and 2 would be acceptable in transport terms. No concerns were raised about safety of the site from vehicles on the A14.

The Inspector also considered the impact and density of the development proposed on the site, which in the appeal proposal was for 182 dwellings over sites 1 and 2. Concerns were raised about the design of the proposed building and questions over its height. The Council has used a lower capacity figure, based on the scale and form of the adjoining, existing residential development for sites 1 and 2, which allow for 30 and 70 dwellings respectively. Whilst it is possible that a suitable scheme could come forward for a higher number, this is considered a reasonable robust capacity to use for the housing shortfall assessment.

The recent appeal decision confirmed that sites 1 and 2 are suitable in technical terms for residential development, having regard to a significant level of technical information and it is appropriate that they be allocated for residential use in the context of the housing shortfall, particularly having regard to the sustainability benefits of providing housing at this location at the top of the search sequence and with the benefit of good quality public transport provision.

Representations Nature Representation Summary Object Following the November 2008 Secretary of State dismissal 22663 - Unex Holdings Limited on appeal of a proposal for 182 homes on Sites 1 and 2 on the grounds of design, and a failure to meet the policy requirements for renewable energy and affordable housing the site is not viable for residential development as proposed by the Council. The requirement to deliver 40%

use development.

affordable housing and 10% renewable energy will increase

the cost to developers of the site. To be sound the site should retain its current potential for commercial or mixed

Council's Assessment

The respondent argues that the site is not deliverable or developable. They refer to a recent appeal decision on sites 1 and 2 (RD/SSPExam/260) which was for 182 dwellings and was dismissed on the grounds of design and because it did not meet the development plan requirements for affordable housing and provision of 10% renewable energy. The respondent argues that the level of development assumed in the housing shortfall work would not be viable (100 dwellings). They say the SOS decision now imposes greater costs on the development to meet the policy targets in full. They say the SOS considered the density of the proposal to be acceptable although they recognise that the design was not accepted. They point to the requirements on the new parcels are higher than on the approved 900 units on Orchard Park and that the sites will therefore not come forward while there are sites that can be delivered at lower cost. They conclude that the appeal decision prevents viable development of the site.

The Council notes that the appeal decision confirms that residential use on the sites is acceptable in principle, that the objective of providing a sustainable mixed use development would not be compromised, and that it would provide housing in a sustainable location consistent with regional and Core Strategy policies as the housing would be in a preferred location for development. It concludes that the proposal would be an efficient use of land and provide much needed housing in a sustainable location. It also concludes that the provision and range of employment land would not be materially affected. The appeal also confirms the proposal provides sufficient open space (through contributions) and adequate car parking provision. It confirms that the site would not be subject to unacceptable noise levels from existing noise sources and that it would provide a satisfactory environment in terms of air quality and would provide a safe environment for its inhabitants. It also confirms that there would not be a material adverse impact on the highway network in the am and pm peaks. The appeal identified specific problems with the development in terms of its design and in terms of affordable housing provision and renewable energy provision. In particular, the SOS commented that the appellant had made no efforts to optimize the chances of the scheme attracting grant and the conscious decision not to rely on Social Housing Grant has had consequences for the overall viability of the proposal.

The Council notes the respondent's concerns relating to potential viability of these sites for residential development. However, the principle that residential use would be appropriate has been established and viability is an extremely sensitive calculation that depends to a significant extent on the assumptions built into financial modeling, the overall package of obligations and market conditions at the time of negotiations. In particular, a scheme which optimizes the chances of securing affordable housing grant would have a material impact on overall viability. Whilst the Council cannot give a guarantee to the respondent that a viable scheme can be granted planning permission, the Council does not accept on the basis of one particular scheme considered through the appeal process, that it can be concluded that a viable scheme will not be able to be permitted and developed by 2016. Viability is a relevant planning consideration, subject to the achievement of a scheme that is acceptable in planning terms. The affordable housing policy (Development Control Polices DPD, Policy HG/3) specifically states that viability will be taken into account in determining planning applications. The number of dwellings assumed for the housing shortfall work is not a ceiling on any scheme and it is possible that a suitable scheme in design terms could come forward that achieves a higher number of units whist still meeting other policy requirements. However, the 100 dwellings over the 2 sites is considered a robust figure to use for the housing shortfall purposes. It is accepted that this is not clear in the proposed new wording for the

Representations	Nature	Representation Summary	Council's Assessment
			supporting text and a change is proposed. The argument about these parcels being more expensive than the remainder of the Orchard Park development is not relevant in housing land supply terms, because the Council is assuming that the existing approved residential development will be completed by 2012/13. Even if there is some slippage on that timetable because of market conditions, it is reasonable to assume that the additional sites could be developed by 2016.
			ACTION
			Amend the 3rd sentence of proposed paragraph 2.3 to read:
			"These known parcels could provide in the order of 220 additional dwellings, although the final number will be determined through detailed planning applications, and could be higher, although regard must be had to the constraints on these parcels."
22546 - Ely Group of Internal Drainage Boards	Object	The identified sites do not directly drain to Internal Drainage Districts within the Ely Group but have the potential to increase downstream run-off/flood risk that may impact on the surface water receiving system on which our Board rely. We therefore ask that a surface water strategy should be required for each site that considers the impact of each individual development on the wider/downstream catchment and that this strategy mitigates the effects of increased run-off to prevent adverse impact. As the sites are quite remote from our area, we would	Any proposals for the sites at Orchard Park would need to demonstrate that they were acceptable in terms of surface water drainage consistent with the policies contained in the Development Control Policies DPD. However, as they would be alternative uses on a larger site already with outline planning consent, no fundamental problems are envisaged. The Environment Agency has been consulted on the proposed sites and no objection has been made. It will also be a consultee on any planning application.
		expect the Environment Agency to be consulted to establish the requirement for each site.	

Representations	Nature	Representation Summary	Council's Assessment
22993 - Impington Parish Council	Object	Object, for the following reasons: - Reduction in sustainability due to loss of employment sites Noise.	The Council considers that residential development on the 3 sites identified at Orchard Park would be appropriate in principle having regard to its location on the edge of Cambridge within the urban area and the accessibility of this location to high quality public transport and to existing employment uses.
	needs of 900 homes. Overdevelopment. IPC confidently expects that the Shadow Orchard Park Community Council will also strongly object to the designation of this site. allocation of the residential environment in allocation of the evidential environment in allocation of the residential environment.	The issues of noise and air quality are clearly very important issues to be taken into account in allocation of the sites by the A14 for residential use and it is important to ensure that a satisfactory residential environment can be created. Any impact of the alternative form of development on the Air Quality Management Area (AQMA) is also an important consideration. These issues were explored in detail at the recent planning appeal on sites 1 and 2 with the benefit of technical evidence and the Inspector's report concludes that noise levels would be within acceptable limits both indoors and outdoors. The Inspector concluded that the proposal would provide a satisfactory environment in terms of air quality. She also concluded that the scheme itself would have an insignificant impact on air quality and on the AQMA.	
			Transport issues were also considered at the recent appeal inquiry and the Inspector concluded that residential development of sites 1 and 2 would be acceptable in transport terms. No concerns were raised about safety of the site from vehicles on the A14. The appeal considered other relevant technical issues relating to this site and concluded that it would provide a suitable residential environment and would be acceptable in terms of car parking, contributions to open space and density. However, the Inspector concluded that the appeal proposal did not provide adequate provision for affordable housing or renewable energy.
			The Inspector also considered the impact and density of the development proposed on the site, which in the appeal proposal was for 182 dwellings over sites 1 and 2. Concerns were raised about the design of the proposed building and questions over its height. The Council has used a lower capacity figure, based on the scale and form of the adjoining, existing residential development for sites 1 and 2, which allow for 30 and 70 dwellings respectively. Whilst it is possible that a suitable scheme could come forward for a higher number, this is considered a reasonable robust capacity to use for the housing shortfall assessment.
			The recent appeal decision confirmed that sites 1 and 2 are suitable in technical terms for residential development, having regard to a significant level of technical information and it is appropriate that they be allocated for residential use in the context of the housing shortfall, particularly having regard to the sustainability benefits of providing housing at this location at the top of the search sequence and with the benefit of good quality public transport provision.

Representations	Nature	Representation Summary	Council's Assessment
22909	Object	 The calculations for identifying a housing shortfall are flawed, and this proposal should be delayed until these are properly validated. The proposal to change from mixed use is unacceptable and a breach of the formal Design Guide for Orchard Park. The proposed density is unacceptably high and much higher than the neighbouring parcels. The proposal makes unsubstantiated claims and fails to reference the Design Guide. The parcel is ill-suited to residential development - as a minimum the mixed use element should be built between the residential dwellings and the A14, to create separation and offer protection. The traffic flow changes will create unacceptable issues for the A14/B1049 junction. It is essential that any additional residential development includes adequate provision for public facilities within the Orchard Park boundary - the enclosed nature of the development makes off-site provision unacceptable. The change of use will increase the parking density creating unacceptable issues for residents. 	The Inspectors have considered the housing land supply in the district to 2016 and have identified a housing shortfall. They advise that unless new allocations are made to ensure this shortfall is met, the DPD will be found unsound. The Council therefore intends to recommend to the Inspectors the sites it would prefer to see allocated to address the shortfall, consistent with the development sequence set out in the Core Strategy with a focus on land on the edge of Cambridge. The Council considers that residential development on the 3 sites identified at Orchard Park would be appropriate in principle having regard to its location on the edge of Cambridge within the urban area and the accessibility of this location to high quality public transport and to existing employment uses. The recent appeal inquiry considered relevant technical issues relating to this site and concluded that it would provide a suitable residential environment and would be acceptable in terms of transport, car parking, noise, air quality, contributions to open space and density. However, the Inspector agreed with the Council that the design of the specific proposal the subject of the appeal was not acceptable. It is considered that an acceptable scheme could be proposed. The capacity of the site for the purposes of the housing shortfall work is deliberately conservative to ensure a robust approach. The actual numbers would be a matter of determination through a planning application. The policy for Orchard Park proposed for inclusion in the DPD requires high standards of design and landscaping. The Inspector concluded that residential development on the sites 1 and 2 would not compromise the creation of a sustainable, mixed use community. The Council agrees with this conclusion.

Nature Representation Summary

Council's Assessment

Site 2: Parcel Com 4, Orchard Park, Cambridge Northern Fringe (West)

Object

22611 - Foxton Parish Council
22850 - Cambridge Preservation
Society
22876 - Hutchison Whampoa
Properties (Europe) Limited
22804 - Countryside Properties
(Special Projects) Limited
22572
22789 - Cambridgeshire
Community Foundation
22897 - Great Shelford Ten Acres
Limited
22949 - Barratt Strategic

This site lies in close proximity to the A14, within the Air Quality Management Area and will be the subject of noise and air pollution. Noise levels adjacent to the A14 would be unacceptable and would provide poor quality of life. It would be wrong for young families especially to breathe nothing but car fumes or to live in homes hermetically sealed against them. The level of carbon emissions from constantly passing traffic would be dangerous to health. It will be some years before the A14 improvements are in place to help address these issues. Until the air quality issues have been resolved it is not known whether 70 residential units can be accommodated at this location without risk to the occupants.

There is no hard shoulder on the A14 at that point, and a vehicle crashing through the flimsy barrier would land on housing at the bottom of the embankment and that is a totally unacceptable risk.

This site is allocated for employment use and that development is required to provide a permanent noise barrier. Against the sequential test, the site ranks as one of the most sustainably located office sites in Cambridge and South Cambridgeshire of which there is a limited supply. Sites for commercial enterprises close to the City should be protected and provided to ensure sustainable development at a much wider level.

70 units are proposed on this relatively small site of 0.94 ha resulting in a density of 74 dph. This site lies in close proximity to the A14, within the Air Quality Management Area and will be the subject of noise and air pollution. The ability to produce a high quality development, which is a desirable place for people to live, given the site's position and the density proposed is questioned. We submit that 56 dwellings represent a more realistic capacity.

The issues of noise and air quality are clearly very important issues to be taken into account in allocation of the sites by the A14 for residential use and it is important to ensure that a satisfactory residential environment can be created. Any impact of the alternative form of development on the Air Quality Management Area (AQMA) is also an important consideration. These issues were explored in detail at the recent planning appeal on sites 1 and 2 with the benefit of technical evidence and the Inspector's report concludes that noise levels would be within acceptable limits both indoors and outdoors. The Inspector concluded that the proposal would provide a satisfactory environment in terms of air quality. She also concluded that the scheme itself would have an insignificant impact on air quality and on the AQMA.

Transport issues were also considered at the recent appeal inquiry and the Inspector concluded that residential development of sites 1 and 2 would be acceptable in transport terms. No concerns were raised about safety of the site from vehicles on the A14.

The use of the site for residential rather than employment use was considered at the appeal inquiry. The Inspector concluded that the loss of a limited amount of employment land in the context of an oversupply of high quality employment premises and a significant overall projected supply would not prejudice the Regional Plan or Core Strategy objectives in relation to employment land. The Council agrees with this view, particularly in the context that this site which is at the top of the search sequence for housing and there is a need to identify additional sites for development to address a housing shortfall.

The Inspector also considered the impact and density of the development proposed on the site, which in the appeal proposal was for 182 dwellings over sites 1 and 2. Concerns were raised about the design of the proposed building and questions over its height. The Council has used a lower capacity figure, based on the scale and form of the adjoining, existing residential development for sites 1 and 2, which allow for 30 and 70 dwellings respectively. Whilst it is possible that a suitable scheme could come forward for a higher number, this is considered a reasonable robust capacity to use for the housing shortfall assessment.

The recent appeal decision confirmed that sites 1 and 2 are suitable in technical terms for residential development, having regard to a significant level of technical information and it is appropriate that they be allocated for residential use in the context of the housing shortfall, particularly having regard to the sustainability benefits of providing housing at this location at the top of the search sequence and with the benefit of good quality public transport provision.

of the search sequence and with the benefit of good quality public transport provision.

Representations	Nature	Representation Summary	Council's Assessment
22994 - Impington Parish Council	Object	Object, for the following reasons: - Reduction in sustainability due to loss of employment sites Noise Air quality. These sites are covered by an AQMA.	The Council considers that residential development on the 3 sites identified at Orchard Park would be appropriate in principle having regard to its location on the edge of Cambridge within the urban area and the accessibility of this location to high quality public transport and to existing employment uses.
		- Lack of Facilities. The site was designed to meet the needs of 900 homes Overdevelopment IPC confidently expects that the Shadow Orchard Park Community Council will also strongly object to the designation of this site.	The issues of noise and air quality are clearly very important issues to be taken into account in allocation of the sites by the A14 for residential use and it is important to ensure that a satisfactory residential environment can be created. Any impact of the alternative form of development on the Air Quality Management Area (AQMA) is also an important consideration. These issues were explored in detail at the recent planning appeal on sites 1 and 2 with the benefit of technical evidence and the Inspector's report concludes that noise levels would be within acceptable limits both indoors and outdoors. The Inspector concluded that the proposal would provide a satisfactory environment in terms of air quality. She also concluded that the scheme itself would have an insignificant impact on air quality and on the AQMA.
			Transport issues were also considered at the recent appeal inquiry and the Inspector concluded that residential development of sites 1 and 2 would be acceptable in transport terms. No concerns were raised about safety of the site from vehicles on the A14. The appeal considered other relevant technical issues relating to this site and concluded that it would provide a suitable residential environment and would be acceptable in terms of car parking, contributions to open space and density. However, the Inspector concluded that the appeal proposal did not provide adequate provision for affordable housing or renewable energy.
			The use of the site for residential rather than employment use was considered at the appeal inquiry. The Inspector concluded that the loss of a limited amount of employment land in the context of an oversupply of high quality employment premises and a significant overall projected supply would not prejudice the Regional Plan or Core Strategy objectives in relation to employment land. The Council agrees with this view, particularly in the context that this site which is at the top of the search sequence for housing and there is a need to identify additional sites for development to address a housing shortfall.
			The Inspector also considered the impact and density of the development proposed on the site, which in the appeal proposal was for 182 dwellings over sites 1 and 2. Concerns were raised about the design of the proposed building and questions over its height. The Council has used a lower capacity figure, based on the scale and form of the adjoining, existing residential development for sites 1 and 2, which allow for 30 and 70 dwellings respectively. Whilst it is possible that a suitable scheme could come forward for a higher number, this is considered a reasonable robust capacity to use for the housing shortfall assessment.
			The recent appeal decision confirmed that sites 1 and 2 are suitable in technical terms for residential development, having regard to a significant level of technical information and it is appropriate that they be allocated for residential use in the context of the housing shortfall, particularly having regard to the sustainability benefits of providing housing at this location at the top of the search sequence and with the heapfit of good quality public transport provision.

Representations	Nature	Representation Summary	Council's Assessment
22910	Object	The calculations for identifying a housing shortfall are flawed, and this proposal should be delayed until these are properly validated.	The Inspectors have considered the housing land supply in the district to 2016 and have identified a housing shortfall. They advise that unless new allocations are made to ensure this shortfall is met, the DPD will be found unsound. The Council therefore intends to recommend to the Inspectors the
		2. The proposal to change from commercial use is unacceptable and a breach of the formal Design Guide for Orchard Park.	sites it would prefer to see allocated to address the shortfall, consistent with the development sequence set out in the Core Strategy with a focus on land on the edge of Cambridge. The Council considers that residential development on the 3 sites identified at Orchard Park would be appropriate in principle having regard to its location on the edge of Cambridge within the urban area and the accessibility of this location to high quality public transport and to existing employment
		3. The proposal fails to reference the Design Guide.	uses.
		 4. The parcel is ill-suited to residential development - as a minimum the mixed use element should be built between the residential dwellings and the A14, to create separation and offer protection. 5. The traffic flow changes will create unacceptable issues for the A14/B1049 junction. 6. It is essential that any additional residential development 	The recent appeal inquiry considered relevant technical issues relating to this site and concluded that it would provide a suitable residential environment and would be acceptable in terms of transport, car parking, noise, air quality, contributions to open space and density. However, the Inspector agreed with the Council that the design of the specific proposal the subject of the appeal was not acceptable. It is considered that an acceptable scheme could be proposed. The capacity of the site for the purposes of the housing shortfall work is deliberately conservative to ensure a robust approach. The actual numbers would be a matter of determination through a planning application. The policy for Orchard Park proposed for inclusion in the DPD requires high standards of design and landscaping.
		includes adequate provision for public facilities within the Orchard Park boundary - the enclosed nature of the development makes off-site provision unacceptable. 7. The possible suggestion to retain the existing noise barrier is in clear conflict with the Design Guide's goals of creating a modern and striking edge. 8. The change of use will increase the parking density creating unacceptable issues for residents.	The Council's aim when the Orchard Park site was originally allocated had been to secure protection for the residential development on the Orchard Park site through non-residential uses adjacent to the A14 and this drove the mixed use proposal. However, the permission for a scheme including residential development between sites 1 and 2 means that a portion of the barrier needs to be retained permanently. The Council recognises that a longer length of noise barrier than currently required to be retained permanently would be necessary but does not consider that the retention of half rather than a quarter of the barrier is so material that the site should not be allocated for residential. There are also ongoing discussions with the Highways Agency about the A14 Improvements and the implications for the noise barrier as a whole.
			The use of the site for residential rather than employment use was considered at the appeal inquiry. The Inspector concluded that the loss of a limited amount of employment land in the context of an oversupply of high quality employment premises and a significant overall projected supply would not prejudice the Regional Plan or Core Strategy objectives in relation to employment land. The Council agrees with this view, particularly in the context that this site which is at the top of the search sequence for housing and there is a need to identify additional sites for development to address a housing shortfall.
			Orchard Park is located close to significant levels of existing employment and a primarily residential scheme is consistent with the approach being taken on the new urban extensions to Cambridge. The key is that these new neighbourhoods include the necessary community facilities and local services to support a sustainable development. The developments do not themselves necessarily need to include significant levels of employment development but the proximity to employment use and accessibility to it by non-car modes is important. This is the case at Orchard Park. The Inspector concluded that residential development on the sites 1 and 2 would not compromise the creation of a sustainable, mixed use community. The Council agrees with this conclusion.

Site 2 : Parcel Com 4, Orchard Park, Cambridge Northern Fringe (West)

Representations	Nature	Representation Summary	Council's Assessment
22547 - Ely Group of Internal Drainage Boards	Object	The identified sites do not directly drain to Internal Drainage Districts within the Ely Group but have the potential to increase downstream run-off/flood risk that may impact on the surface water receiving system on which our Board rely. We therefore ask that a surface water strategy should be required for each site that considers the impact of each individual development on the wider/downstream catchment and that this strategy mitigates the effects of increased run-off to prevent adverse impact. As the sites are quite remote from our area, we would expect the Environment Agency to be consulted to establish the requirement for each site.	Any proposals for the sites at Orchard Park would need to demonstrate that they were acceptable in terms of surface water drainage consistent with the policies contained in the Development Control Policies DPD. However, as they would be alternative uses on a larger site already with outline planning consent, no fundamental problems are envisaged. The Environment Agency has been consulted on the proposed sites and no objection has been made. It will also be a consultee on any planning application.

Representations Nature Representation Summary Council's Assessment Council's Assessment The respondent argues that the site decision on sites 1 and 2 on the grounds of design, and a failure to meet the policy requirements for renewable energy and affordable housing the site is not viable for residential development as proposed by the Council. The requirement to deliver 40% affordable housing and 10% renewable energy will increas the cost to developers of the site. To be sound the site

use development.

should retain its current potential for commercial or mixed

The respondent argues that the site is not deliverable or developable. They refer to a recent appeal decision on sites 1 and 2 (RD/SSPExam/260) which was for 182 dwellings and was dismissed on the grounds of design and because it did not meet the development plan requirements for affordable housing and provision of 10% renewable energy. The respondent argues that the level of development assumed in the housing shortfall work would not be viable (100 dwellings). They say the SOS decision now imposes greater costs on the development to meet the policy targets in full. They say the SOS considered the density of the proposal to be acceptable although they recognise that the design was not accepted. They point to the requirements on the new parcels are higher than on the approved 900 units on Orchard Park and that the sites will therefore not come forward while there are sites that can be delivered at lower cost. They conclude that the appeal decision prevents viable development of the site.

The Council notes that the appeal decision confirms that residential use on the sites is acceptable in principle, that the objective of providing a sustainable mixed use development would not be compromised, and that it would provide housing in a sustainable location consistent with regional and Core Strategy policies as the housing would be in a preferred location for development. It concludes that the proposal would be an efficient use of land and provide much needed housing in a sustainable location. It also concludes that the provision and range of employment land would not be materially affected. The appeal also confirms the proposal provides sufficient open space (through contributions) and adequate car parking provision. It confirms that the site would not be subject to unacceptable noise levels from existing noise sources and that it would provide a satisfactory environment in terms of air quality and would provide a safe environment for its inhabitants. It also confirms that there would not be a material adverse impact on the highway network in the am and pm peaks. The appeal identified specific problems with the development in terms of its design and in terms of affordable housing provision and renewable energy provision. In particular, the SOS commented that the appellant had made no efforts to optimize the chances of the scheme attracting grant and the conscious decision not to rely on Social Housing Grant has had consequences for the overall viability of the proposal.

The Council notes the respondent's concerns relating to potential viability of these sites for residential development. However, the principle that residential use would be appropriate has been established and viability is an extremely sensitive calculation that depends to a significant extent on the assumptions built into financial modeling, the overall package of obligations and market conditions at the time of negotiations. In particular, a scheme which optimizes the chances of securing affordable housing grant would have a material impact on overall viability. Whilst the Council cannot give a guarantee to the respondent that a viable scheme can be granted planning permission, the Council does not accept on the basis of one particular scheme considered through the appeal process, that it can be concluded that a viable scheme will not be able to be permitted and developed by 2016. Viability is a relevant planning consideration, subject to the achievement of a scheme that is acceptable in planning terms. The affordable housing policy (Development Control Polices DPD, Policy HG/3) specifically states that viability will be taken into account in determining planning applications. The number of dwellings assumed for the housing shortfall work is not a ceiling on any scheme and it is possible that a suitable scheme in design terms could come forward that achieves a higher number of units whist still meeting other policy requirements. However, the 100 dwellings over the 2 sites is considered a robust figure to use for the housing shortfall purposes. It is accepted that this is not clear in the proposed new wording for the

Representations	Nature	Representation Summary	Council's Assessment
			supporting text and a change is proposed. The argument about these parcels being more expensive than the remainder of the Orchard Park development is not relevant in housing land supply terms, because the Council is assuming that the existing approved residential development will be completed by 2012/13. Even if there is some slippage on that timetable because of market conditions, it is reasonable to assume that the additional sites could be developed by 2016.
			ACTION
			Amend the 3rd sentence of proposed paragraph 2.3 to read:
			"These known parcels could provide in the order of 220 additional dwellings, although the final number will be determined through detailed planning applications, and could be higher, although regard must be had to the constraints on these parcels."
22985 - Histon Parish Council	Object	By changing Orchard Park (Arbury Park) from a mixed development to a totally residential one the sustainability of the site is compromised. The District Council provides little detail as to how any infrastructure deficit will be managed and how the development will be sustainable. Further by turning this area into a wholly residential one it runs the risk that the identity will become subsumed into a "Greater Arbury". We were promised that the development of this area, as the gateway to Northern Cambridge, would provide a distinct sustainable community. The test of releasing this land for residential development should be that those that make the decision should be made to live in one of the units adjacent to the A14 for a period. No decision should be taken until the effect of all the developments proposed around the Histon Road/King Hedges junction have been properly modelled for their impact on traffic.	Orchard Park is located close to significant levels of existing employment and a primarily residential scheme is consistent with the approach being taken on the new urban extensions to Cambridge. The key is that these new neighbourhoods include the necessary community facilities and local services to support a sustainable development. The developments do not themselves necessarily need to include significant levels of employment development but the proximity to employment use and accessibility to it by non-car modes is important. This is the case at Orchard Park. The Inspector concluded that residential development on the sites 1 and 2 would not compromise the creation of a sustainable, mixed use community. The Council agrees with this conclusion. The Council will require any proposals to comply with the LDF policies for the range of necessary supporting infrastructure whether that is through on site provision or contributions for off-site provision. Whilst on site provision is normally preferable, it is not uncommon for contributions to be taken and used near to a development for new or enhanced facilities. That would be a matter for consideration through a detailed proposal. For example, open space provision was considered at the recent appeal inquiry and the Inspector concluded that that the approved Orchard Park development will not have a shortage of open space and that provision can satisfactorily be achieved by the payment of a commuted sum for provision nearby.

Representations	Nature	Representation Summary	Council's Assessment
Site 3 : Parcel Q and H.R.O	C.C., Orch	ard Park, Cambridge Northern Fringe (West)	
22548 - Ely Group of Internal Drainage Boards	Object	The identified sites do not directly drain to Internal Drainage Districts within the Ely Group but have the potential to increase downstream run-off/flood risk that may impact on the surface water receiving system on which our Board rely. We therefore ask that a surface water strategy should be required for each site that considers the impact of each individual development on the wider/downstream catchment and that this strategy mitigates the effects of increased run-off to prevent adverse impact. As the sites are quite remote from our area, we would expect the Environment Agency to be consulted to establish the requirement for each site.	Any proposals for the sites at Orchard Park would need to demonstrate that they were acceptable in terms of surface water drainage consistent with the policies contained in the Development Control Policies DPD. However, as they would be alternative uses on a larger site already with outline planning consent, no fundamental problems are envisaged. The Environment Agency has been consulted on the proposed sites and no objection has been made. It will also be a consultee on any planning application.
22995 - Impington Parish Council	Object	Object for the following reasons: Reduction in sustainability. Lack of Facilities. Overdevelopment. It is overdevelopment of the site. Noise. Air quality. IPC confidently expects that the Shadow Orchard Park Community Council will also strongly object to the designation of this site.	The Council considers that residential development on the 3 sites identified at Orchard Park would be appropriate in principle having regard to its location on the edge of Cambridge within the urban area and the accessibility of this location to high quality public transport and to existing employment uses. The capacity of the site for the purposes of the housing shortfall work is deliberately conservative to ensure a robust approach. The actual numbers would be a matter of determination through a planning application and having regard to the context of the site. Whilst this site does not have the benefit of the technical evidence available for sites 1 and 2, the findings of that evidence is helpful in supporting the proposal for residential use on this site. Detailed issues of noise, air quality and traffic impacts will clearly need to be considered for this site in the context of a detailed proposed but it is considered sufficiently likely that a satisfactory scheme can be achieved that it can be included to address the housing shortfall. In terms of traffic impact, there is greater certainty that the site can be accommodated once the A14 improvements are completed which the Highways Agency has advised is proposed to be in mid 2014, which will allow adequate time for this site to be developed by 2016 if traffic proved to be a constraints earlier. The capacity of the site for the purposes of the housing shortfall work is deliberately conservative to ensure a robust approach. The actual numbers would be a matter of determination through a planning application and having regard to the context of the site and would also still enable a mixed use scheme to come forward if found to be appropriate, eg. with residential over. The policy for Orchard Park proposed for inclusion in the DPD requires high standards of design and landscaping and the creation of gateway features. This will be particularly relevant in the case of this site which is an important site on the edge of the development and fronting Histon Road.

sequence.

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22852 - Cambridge Preservation Society 22877 - Hutchison Whampoa Properties (Europe) Limited 22805 - Countryside Properties (Special Projects) Limited 22658 22898 - Great Shelford Ten Acres Limited

22950 - Barratt Strategic

22986 - Histon Parish Council

Respondents raise a variety of concerns. This change of plan is a result of Northstowe not coming forward as quickly as anticipated and the delays in constructing Orchard Park; it is clear that the need to find new houses is not too urgent.

By changing Orchard Park (Arbury Park) from a mixed development to a totally residential one the sustainability of the site is compromised. The District Council provides little detail as to how any infrastructure deficit will be managed and how the development will be sustainable. Until the air quality issues have been resolved at this location and the environmental and archaeologically informed capacity has been determined, it is not known whether 120 residential units can be accommodated at this site. Histon Road is already inadequate for the traffic flows at peak periods and the situation will deteriorate further when the present proposals for Orchard Park are completed. There should be no further development in this area until the infrastructure is improved. The Guided Busway will not provide any benefit to this area for people travelling into the City.

Non development of this site preserves the distinction between Cambridge and the villages of Impington and Histon. This is the site of the Roman Camp and is one of the reasons why it was not included in the Arbury Park development. This site should be safeguarded for the Heritage Centre or other community provision only with some minor housing. The original Arbury Park development promised that Site 3 would have some architectural merit, befitting visitors arriving from the North of Cambridge to this ancient and historic city. We are reminded that this whole area was taken out of the Green Belt only on condition that it would be used for development of "national strategic importance".

120 units are proposed on this site of 1.93 ha, resulting in a density of 62 dph. This site was intended to accommodate a Heritage Centre and form part of a development in a campus setting. The character of this part of the site will be fundamentally changed by the introduction of residential development at this density and with the loss of community use. Should this site be developed for residential, it is submitted that it would be appropriate to set aside part of the site for open space, helping to create the feeling of a campus style development and providing valuable open

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The Inspectors have considered the housing land supply in the district to 2016 and have identified a housing shortfall. They advise that unless new allocations are made to ensure this shortfall is met, the DPD will be found unsound. The Council therefore intends to recommend to the Inspectors the sites it would prefer to see allocated to address the shortfall, consistent with the development sequence set out in the Core Strategy with a focus on land on the edge of Cambridge. The Council considers that residential development on the 3 sites identified at Orchard Park would be appropriate in principle having regard to its location on the edge of Cambridge within the urban area and the accessibility of this location to high quality public transport and to existing employment uses.

The capacity of the site for the purposes of the housing shortfall work is deliberately conservative to ensure a robust approach. The actual numbers would be a matter of determination through a planning application and having regard to the context of the site and would also still enable a mixed use scheme to come forward if found to be appropriate, eg. with residential over. The policy for Orchard Park proposed for inclusion in the DPD requires high standards of design and landscaping and the creation of gateway features. This will be particularly relevant in the case of this site which is an important site on the edge of the development and fronting Histon Road. Whilst the policy refers to gateway features, this point could be emphasised through additional wording in the proposed supporting text along with the need to respect the separation between Cambridge and Histon and Impington to the north of the A14.

This site was proposed for development in the original masterplan, for mixed uses on the corner with a heritage resource centre adjacent to the east. The County Council has concluded that this is no longer its preferred location for the heritage centre. The Roman Camp to the north must be protected in any proposed development and the policy requires the "preservation or enhancement of the Arbury Camp site of archaeological interest".

Whilst this site does not have the benefit of the technical evidence available for sites 1 and 2, the findings of that evidence is helpful in supporting the proposal for residential use on this site. Detailed issues of noise, air quality and traffic impacts will clearly need to be considered for this site in the context of a detailed proposed but it is considered sufficiently likely that a satisfactory scheme can be achieved that it can be included to address the housing shortfall. In terms of traffic impact, there is greater certainty that the site can be accommodated once the A14 improvements are completed which the Highways Agency has advised is proposed to be in mid 2014, which will allow adequate time for this site to be developed by 2016 if traffic proved to be a constraints earlier.

Orchard Park is located close to significant levels of existing employment and a primarily residential scheme is consistent with the approach being taken on the new urban extensions to Cambridge. The key is that these new neighbourhoods include the necessary community facilities and local services to support a sustainable development. The developments do not themselves necessarily need to include significant levels of employment development or other non-residential uses but the proximity to employment use and services and facilities and accessibility to them by non-car modes is important. This is the case at Orchard Park and a new local centre and community facilitates are included in the development. The Council is particularly mindful that this site is at the top of the search sequence for housing and there is a need to identify additional sites for development to address a housing shortfall. An edge of Cambridge location is preferable to significant levels of

Representations	Nature	Representation Summary	Council's Assessment
		space for the considerable numbers of residents. In view of this, the number of dwellings on this site should be reduced and 80 would seem a reasonable figure.	new development in the villages which are at the bottom of the development sequence. ACTION Add new final sentence to proposed para 2.3 to read: " The south west part of the site fronts onto both Histon Road and Kings Hedges Road and will provide an important gateway building for those entering the historic City of Cambridge from the north. A high quality landmark building will therefore be required, which provides an appropriate frontage to Histon Road and reflects its edge of City location and the need to respect the separation with Histon and Impington village to the north of the A14."
22954 - Martin Grant Homes Limited 22955 - Harcourt Developments Limited	Object	We object to the Council's assessment of delivery. The principal of the development of Sites 1 and 2 for housing has been established at appeal (APP/W0530/A/08/2062801) although any future scheme will be required to satisfy the design considerations identified by the Inspector. As to Site 3, the LPA has failed to demonstrate the sites suitability for development and we object to the allocation of the site on this basis. The site should be deleted as a proposed allocation.	The Council considers that residential development on the 3 sites identified at Orchard Park would be appropriate in principle having regard to its location on the edge of Cambridge within the urban area and the accessibility of this location to high quality public transport and to existing employment uses. The capacity of the site for the purposes of the housing shortfall work is deliberately conservative to ensure a robust approach. The actual numbers would be a matter of determination through a planning application and having regard to the context of the site. Whilst this site does not have the benefit of the technical evidence available for sites 1 and 2, the findings of that evidence is helpful in supporting the proposal for residential use on this site. Detailed issues of noise, air quality and traffic impacts will clearly need to be considered for this site in the context of a detailed proposed but it is considered sufficiently likely that a satisfactory scheme can be achieved that it can be included to address the housing shortfall. In terms of traffic impact, there is greater certainty that the site can be accommodated once the A14 improvements are completed which the Highways Agency has advised is proposed to be in mid 2014, which will allow adequate time for this site to be developed by 2016 if traffic proved to be a constraints earlier. Orchard Park is located close to significant levels of existing employment and a primarily residential scheme is consistent with the approach being taken on the new urban extensions to Cambridge. This site is at the top of the search sequence for housing and there is a need to identify additional sites for development to address a housing shortfall. An edge of Cambridge location is preferable to significant levels of new development in the villages, which are at the bottom of the development sequence.

Representations	Nature	Representation Summary	Council's Assessment
22911	Object	The calculations for identifying a housing shortfall are flawed, and this proposal should be delayed until these are properly validated. The proposal to change from mixed use is unacceptable and a breach of the formal Design Guide for Orchard Park. The proposal follows a formal property of the property of the proposal for the formal Design Guide for Orchard Park.	The Inspectors have considered the housing land supply in the district to 2016 and have identified a housing shortfall. They advise that unless new allocations are made to ensure this shortfall is met, the DPD will be found unsound. The Council therefore intends to recommend to the Inspectors the sites it would prefer to see allocated to address the shortfall, consistent with the development sequence set out in the Core Strategy with a focus on land on the edge of Cambridge. The Council considers that residential development on the 3 sites identified at Orchard Park would be appropriate in principle having regard to its location on the edge of Cambridge within the urban area
		3. The proposal fails to reference the Design Guide.4. The traffic flow changes will create unacceptable issues	and the accessibility of this location to high quality public transport and to existing employment uses.
		for the A14/B1049 junction. 5. The previous change of use of public open space to land	Whilst this site does not have the benefit of the technical evidence available for sites 1 and 2, the findings of that evidence is helpful in supporting the proposal for residential use on this site. Detailed issues of noise, air quality and traffic impacts will clearly need to be considered for this site
		for use by HRCC should now be rescinded as the HRCC development is no longer progressing - it should not be allocated to housing development.	in the context of a detailed proposed but it is considered sufficiently likely that a satisfactory scheme can be achieved that it can be included to address the housing shortfall. In terms of traffic impact, there is greater certainty that the site can be accommodated once the A14 improvements are completed which the Highways Agency has advised is proposed to be in mid 2014, which will allow
		6. It is essential that any additional residential development includes adequate provision for public facilities within the	adequate time for this site to be developed by 2016 if traffic proved to be a constraints earlier.
		Orchard Park boundary - the enclosed nature of the development makes off-site provision unacceptable.	The capacity of the site for the purposes of the housing shortfall work is deliberately conservative to ensure a robust approach. The actual numbers would be a matter of determination through a planning application and having regard to the context of the site and would also still enable a mixed
		7. The change of use will increase the parking density creating unacceptable issues for residents.	use scheme to come forward if found to be appropriate, eg. with residential over. The policy for Orchard Park proposed for inclusion in the DPD requires high standards of design and landscaping and the creation of gateway features. This will be particularly relevant in the case of this site which is an important site on the edge of the development and fronting Histon Road.
			Orchard Park is located close to significant levels of existing employment and a primarily residential scheme is consistent with the approach being taken on the new urban extensions to Cambridge. This site is at the top of the search sequence for housing and there is a need to identify additional sites for development to address a housing shortfall. An edge of Cambridge location is preferable to significant levels of new development in the villages, which are at the bottom of the development sequence.
22612 - Foxton Parish Council	Support	Within area allocated for development. Air quality to be investigated in planning process.	Support noted.

Sites 1 - 3 Orchard Park, Cambridge Northern Fringe (West)

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Object 23238 - Orchard Park Community

23229 - Orchard Park Community Council

23212 - Orchard Park Community Council

23210 - Orchard Park Community Council

23246 - Orchard Park Community Council

With the current housing market situation, any drive towards additional housing must necessarily either simply fail or lead to situations of poor quality applications being granted based solely on numbers dictated without basis in market realities. South Cambridgeshire has already acknowledged several important mistakes made in Orchard Park, specifically highlighted in the reports of the SCDC Scrutiny Committee's Task and Finish Group. There should be no further action until current issues are resolved.

All current facilities, specifically the school, the community centre, the sports facilities and the public open spaces on Orchard Park have been designed and specified based on 900 dwellings. The proposed 220 additional dwellings will cause a notable strain on the current facilities. Especially as the so-called HRCC site (part of site 3) is highlighted as one of the areas of public space within Orchard Park in the Arbury Park Design Guide.

The proportional loss of amenity space cannot be reasonably made up via off-site provision, due to the effect of Orchard Park's enclosure. Any off-site provision would be of benefit to residents of other areas rather than those of Orchard Park.

Sites 1 and 2 are allocated to commercial use in the Design Guide and the outline permission for Orchard Park. There were good reasons for this. Orchard Park as a community possesses no true potential for expansion and thus must seek to satisfy as many demands as possible within its limited borders. One demand is for jobs. Having Orchard Park develop into a mixed development was a cornerstone of the intended sustainable community, as it allows for people to find both employment and residency in this community. It will reduce the need for residents to commute to work by car.

The commercial development proposed on sites 1 and 2 is expected to shield the residents of Orchard Park against the noise of the A14 - clearly audible despite the sound barrier, which is only intended to be temporary itself. The lack of a building barrier already requires the retention of the sound barrier towards the eastern end of Orchard Park. where residential development along the A14 has been granted. The commercial buildings proposed for site 1 and 2 are also expected to separate Orchard Park and its

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The Inspectors have considered the housing land supply in the district to 2016 and have identified a housing shortfall. They advise that unless new allocations are made to ensure this shortfall is met. the DPD will be found unsound. The Council therefore intends to recommend to the Inspectors the sites it would prefer to see allocated to address the shortfall, consistent with the development sequence set out in the Core Strategy with a focus on land on the edge of Cambridge. The Council considers that residential development on the 3 sites identified at Orchard Park would be appropriate in principle having regard to its location on the edge of Cambridge within the urban area and the accessibility of this location to high quality public transport and to existing employment uses. The Council's Scrutiny Committee has considered the Orchard Park in some detail and identified a number of lessons that will be relevant for the remainder of the development of Orchard Park and also for future major developments. They relate particularly to the way a site is implemented to ensure a decent living environment is created for early residents onto a major site during the construction period.

It will be important that any new residential development at Orchard Park over and above the 900 dwellings approved make provision for any enhancement to community services and facilities. The Council's normal policies will apply in this respect.

The recent appeal inquiry for sites 1 and 2 considered provision of open space. The Inspector concluded that there is not a shortage of open space on Arbury Park itself as a result of the development of 900 homes. The Inspector agreed that commuted sums would be acceptable for these sites with provision of further open space provision being made nearby. Whilst provision of open space is normally preferred on site, the Council's Development Control Policies DPD Policy SF/10 required provision to be made either on site or through contributions for new provision or enhancements to new facilities. The supporting text advises that on site provision is generally preferable but it is not an absolute requirement. There may be more potential for on site provision in respect of site 3, which adjoins a proposed area of open space. While Orchard Park is separated from the adjoining parts of Cambridge by Kings Hedges Road, it does form part of the built up area of Cambridge and should not be considered in isolation.

Orchard Park is located close to significant levels of existing employment and a primarily residential scheme is consistent with the approach being taken on the new urban extensions to Cambridge. The key is that these new neighbourhoods include the necessary community facilities and local services to support a sustainable development. The developments do not themselves necessarily need to include significant levels of employment development or other non-residential uses but the proximity to employment use and services and facilities and accessibility to them by non-car modes is important. This is the case at Orchard Park and a new local centre and community facilitates are included in the development.

The Council's aim when the Orchard Park site was originally allocated had been to secure protection for the residential development on the Orchard Park site through non-residential uses adjacent to the A14 and this drove the mixed use proposal. However, the permission for a scheme including residential development between sites 1 and 2 means that a portion of the barrier needs to be retained permanently. The Council recognises that a longer length of noise barrier than currently required to be retained permanently would be necessary but does not consider that the retention of half rather than a quarter of the barrier is so material that the site should not be

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residents from the pollution caused by the traffic on the A14; the declaration of this area of land as an Air Quality Management Area amply demonstrates the need for such a separation. Site 3 will also not have acceptable living conditions due to the surrounding roads - Kings Hedges Road, the B1049 and the A14/Histon roundabout.

Council's Assessment

allocated for residential. There are also ongoing discussions with the Highways Agency about the A14 Improvements and the implications for the noise barrier as a whole. The Council is aware of local concerns about reflected noise and this will be considered through the Council's discussions with the Highways Agency and developers about the future of the noise barrier.

The issues of noise and air quality are clearly very important issues to be taken into account in allocation of the sites by the A14 for residential use and it is important to ensure that a satisfactory residential environment can be created. Any impact of the alternative form of development on the Air Quality Management Area (AQMA) is also an important consideration. These issues were explored in detail at the recent planning appeal on sites 1 and 2 with the benefit of technical evidence and the Inspector's report concludes that noise levels would be within acceptable limits both indoors and outdoors. The Inspector concluded that the proposal would provide a satisfactory environment in terms of air quality. She also concluded that the scheme itself would have an insignificant impact on air quality and on the AQMA.

The recent appeal decision confirmed that sites 1 and 2 are suitable in technical terms for residential development, having regard to a significant level of technical information and it is appropriate that they be allocated for residential use in the context of the housing shortfall, particularly having regard to the sustainability benefits of providing housing at this location at the top of the search sequence and with the benefit of good quality public transport provision.

Whilst site 3 does not have the benefit of the technical evidence available for sites 1 and 2, the findings of that evidence is helpful in supporting the proposal for residential use on this site. Detailed issues of noise, air quality and traffic impacts will clearly need to be considered for this site in the context of a detailed proposed but it is considered sufficiently likely that a satisfactory scheme can be achieved that it can be included to address the housing shortfall. In terms of traffic impact, there is greater certainty that the site can be accommodated once the A14 improvements are completed which the Highways Agency has advised is proposed to be in mid 2014, which will allow adequate time for this site to be developed by 2016 if traffic proved to be a constraints earlier.

The Council is particularly mindful that these sites are at the top of the search sequence for housing and there is a need to identify additional sites for development to address a housing shortfall. An edge of Cambridge location is preferable to significant levels of new development in the villages which are at the bottom of the development sequence.

Representations	Nature	Representation Summary	Council's Assessment
22790 - Cambridgeshire Community Foundation	Object	Under the current planning policy context there is no prospect of: (i) enhancing quality of life as the s106 agreement does not provide a long term source of funding for community capacity building and activities.	Any residential proposals on these sites would need to comply with the normal development control policies for supporting infrastructure either through on site provision or through contributions as appropriate. The section 106 process will secure contributions to the provision of new facilities and future maintenance that are reasonable and consistent with government policy. Orchard Park forms part of the built up area of Cambridge and should not be considered in isolation.
		Any proposals need to secure a development which as a minimum provides: (i) an employment element to align homes with jobs and reduce the need to travel; (ii) a permanent noise barrier through the employment element; (iii) quality of life by vesting ownership of the employment element in community hands to enable the community to meet its own needs from a permanent source of income; (iv) the usual planning obligations - provision of affordable housing, school places, highway improvements. The proposal builds on a similar approach pioneered at Sackville House, Cambourne. The developer could transfer the site and a capital sum for the employment / permanent noise barrier to a community owned company which would develop and manage the scheme and invest surplus rental income in community-based activities.	The use of the site for residential rather than employment use was considered at the appeal inquiry. The Inspector concluded that the loss of a limited amount of employment land in the context of an oversupply of high quality employment premises and a significant overall projected supply would not prejudice the Regional Plan or Core Strategy objectives in relation to employment land. The Council agrees with this view, particularly in the context that this site which is at the top of the search sequence for housing and there is a need to identify additional sites for development to address a housing shortfall. The Council's aim when the Orchard Park site was originally allocated had been to secure protection for the residential development on the Orchard Park site through non-residential uses adjacent to the A14 and this drove the mixed use proposal. Orchard Park is located close to significant levels of existing employment and a primarily residential scheme is consistent with the approach being taken on the new urban extensions to Cambridge. The key is that these new neighbourhoods include the necessary community facilities and local services to support a sustainable development. The developments do not themselves necessarily need to include significant levels of employment development or other non-residential uses but the proximity to employment use and services and facilities and accessibility to them by non-car modes is important. This is the case at Orchard Park and a new local centre and community facilitates are included in the development.
		I have begun the process of engaging with the local community through the newly formed Shadow Council.	The issues of noise and air quality are clearly very important issues to be taken into account in allocation of the sites by the A14 for residential use and it is important to ensure that a satisfactory residential environment can be created. Any impact of the alternative form of development on the Air Quality Management Area (AQMA) is also an important consideration. These issues were explored in detail at the recent planning appeal on sites 1 and 2 with the benefit of technical evidence and the Inspector's report concludes that noise levels would be within acceptable limits both indoors and outdoors. The Inspector concluded that the proposal would provide a satisfactory environment in terms of air quality. She also concluded that the scheme itself would have an insignificant impact on air quality and on the AQMA.

Sites 1 - 3 Orchard Park, Cambridge Northern Fringe (West)

Representations	Nature	Representation Summary	Council's Assessment
22871 - English Heritage	Object	Site 3 is in a very visible location and may be regarded as a 'gateway' site (both into the city from the north but also into the Orhard park development). It will therefore require an appropriate design solution, which is unlikely to be delivered through standard housing layouts and will need particular attention.	The policy for Orchard Park proposed for inclusion in the DPD requires high standards of design and landscaping and the creation of gateway features. This will be particularly relevant in the case of this site which is an important site on the edge of the development and fronting Histon Road. Whilst the policy refers to gateway features, this point could be emphasised through additional wording in the proposed supporting text along with the need to respect the separation between Cambridge and Histon and Impington to the north of the A14.
			ACTION
			Add new final sentence to proposed para 2.3 to read:
			" The south west part of the site fronts onto both Histon Road and Kings Hedges Road and will provide an important gateway building for those entering the historic City of Cambridge from the north. A high quality landmark building will therefore be required, which provides an appropriate frontage to Histon Road and reflects its edge of City location and the need to respect the separation with Histon and Impington village to the north of the A14."

Representations Nature Representation Summary 22708 - Cambridge City Council Object The City Council objects to the allocation of Sites 1, 2 and 3 at Orchard Park for residential development. Further work needs to be carried out in relation to noise, air quality and transport before the sites are allocated. The allocation would result in the loss of employment which would not be in line with the ELR. If the commercial development is not

going to be built, a permanent noise barrier will be

justify sub-standard sites.

of the City. The sequential test should not be used to

necessary which is unacceptable with regard to the setting

Council's Assessment

The Inspectors have considered the housing land supply in the district to 2016 and have identified a housing shortfall. They advise that unless new allocations are made to ensure this shortfall is met, the DPD will be found unsound. The Council therefore intends to recommend to the Inspectors the sites it would prefer to see allocated to address the shortfall, consistent with the development sequence set out in the Core Strategy with a focus on land on the edge of Cambridge. The Council considers that residential development on the 3 sites identified at Orchard Park would be appropriate in principle having regard to its location on the edge of Cambridge within the urban area and the accessibility of this location to high quality public transport.

Orchard Park is located close to significant levels of existing employment and a primarily residential scheme is consistent with the approach being taken on the new urban extensions to Cambridge. The key is that these new neighbourhoods include the necessary community facilities and local services to support a sustainable development. The developments do not themselves necessarily need to include significant levels of employment development or other non-residential uses but the proximity to employment use and services and facilities and accessibility to them by non-car modes is important. This is the case at Orchard Park and a new local centre and community facilitates are included in the development.

The use of the site for residential rather than employment use was considered at the recent appeal inquiry into sites 1 and 2. The Inspector concluded that the loss of a limited amount of employment land in the context of an oversupply of high quality employment premises and a significant overall projected supply would not prejudice the Regional Plan or Core Strategy objectives in relation to employment land. The Council agrees with this view, particularly in the context that this site which is at the top of the search sequence for housing and there is a need to identify additional sites for development to address a housing shortfall.

The Council's aim when the Orchard Park site was originally allocated had been to secure protection for the residential development on the Orchard Park site through non-residential uses adjacent to the A14 and this drove the mixed use proposal. However, the permission for a scheme including residential development between sites 1 and 2 means that a portion of the barrier needs to be retained permanently. The Council recognises that a longer length of noise barrier than currently required to be retained permanently would be necessary but does not consider that the retention of half rather than a quarter of the barrier is so material that the site should not be allocated for residential. There are also ongoing discussions with the Highways Agency about the A14 Improvements and the implications for the noise barrier as a whole. The Council is aware of local concerns about reflected noise and this will be considered through the Council's discussions with the Highways Agency and developers about the future of the noise barrier.

The issues of noise and air quality are clearly very important issues to be taken into account in allocation of the sites by the A14 for residential use and it is important to ensure that a satisfactory residential environment can be created. Any impact of the alternative form of development on the Air Quality Management Area (AQMA) is also an important consideration. These issues were explored in detail at the recent planning appeal on sites 1 and 2 with the benefit of technical evidence and the Inspector's report concludes that noise levels would be within acceptable limits both indoors and outdoors. The Inspector concluded that the proposal would provide a satisfactory environment in terms of air quality. She also concluded that the scheme itself would have an

Representations	Nature	Representation Summary	Council's Assessment
			insignificant impact on air quality and on the AQMA.
			The recent appeal decision confirmed that sites 1 and 2 are suitable in technical terms for residential development, having regard to a significant level of technical information and it is appropriate that they be allocated for residential use in the context of the housing shortfall, particularly having regard to the sustainability benefits of providing housing at this location at the top of the search sequence and with the benefit of good quality public transport provision.
			Whilst site 3 does not have the benefit of the technical evidence available for sites 1 and 2, the findings of that evidence is helpful in supporting the proposal for residential use on this site. Detailed issues of noise, air quality and traffic impacts will clearly need to be considered for this site in the context of a detailed proposed but it is considered sufficiently likely that a satisfactory scheme can be achieved that it can be included to address the housing shortfall. In terms of traffic impact, there is greater certainty that the site can be accommodated once the A14 improvements are completed which the Highways Agency has advised is proposed to be in mid 2014, which will allow adequate time for this site to be developed by 2016 if traffic proved to be a constraints earlier. The Council is particularly mindful that these sites are at the top of the search sequence for housing
			and there is a need to identify additional sites for development to address a housing shortfall. An edge of Cambridge location is preferable to significant levels of new development in the villages which are at the bottom of the development sequence.
22723 - Girton Parish Council	Object	Change of use and overdevelopment of site.	The capacity of the site for the purposes of the housing shortfall work is deliberately conservative to ensure a robust approach. The actual numbers would be a matter of determination through a planning application and having regard to the context of the site and would also still enable a mixed use scheme to come forward if found to be appropriate, eg. with residential over. The policy for Orchard Park proposed for inclusion in the DPD requires high standards of design and landscaping and the creation of gateway features. This will be particularly relevant in the case of this site which is an important site on the edge of the development and fronting Histon Road.
22919 - Highways Agency	Object	The Highway Agency supports in principle the provision of the 'Responding to a Housing Shortfall' document. The Highway Authority previously concluded that the provision of an additional circa 220 dwellings required further technical assessment before we could advise with any degree of certainty regarding the potential impact of these development proposals upon the A14	Detailed transport issues will need to be considered for this site in the context of a detailed proposed but it is considered sufficiently likely that a satisfactory scheme can be achieved that it can be included to address the housing shortfall. This proposal is for an alternative use to one that was previously proposed and therefore whilst the net change needs to be considered it is not an entirely new proposal. In terms of traffic impact, there is greater certainty that the site can be accommodated once the A14 improvements are completed which the Highways Agency has advised is proposed to be in mid 2014, which will allow adequate time for this site to be developed by 2016 if traffic proved to be a constraints earlier.

Representations	Nature	Representation Summary	Council's Assessment
23001 - RSPB	Object	The RSPB welcomes proposals to link the site to surrounds through sustainable transport. However, we recommend highlighting the carbon emissions reduction rationale for this provision, to promote climate change awareness. Further, that requirements to incorporate energy efficiency and water conservation measures in the redevelopment are included in the policy. The RSPB recommends that requirement for an EIA of the site prior to development be included in SP/1, in recognition of the potential biodiversity value of brownfield. Also, that SP/1 explicitly states that open space will be considered as areas of nature conservation value, enabling quiet enjoyment of the natural environment.	The sustainability merits of the site are included in the proposed supporting text. The policy for the site must be read in conjunction with the other parts of the LDF and the Development Control Policies DPD includes policies requiring energy efficiency and water conservation measures. It is not appropriate to repeat those policies here.

Representations 22741 23214 - RLW Estates 22691 22697 22853 - Cambridge Preservation Society 22621 22607 22802 - Countryside Properties (Special Projects) Limited 22483 22484 22485 22543 22575 22588 22585 22652 22653 22758

Nature Representation Summary

Object

Respondents raise a variety of issues. Castle area of the City is already heavily populated and by allocating additional sites in this area it will make the situation much worse. There is too much development in this area. Even with the proposed changes of the A14, there is not the infrastructure to support additional housing.

Impington continues to see a steady deterioration in the quality of life in the village with ever increasing levels of air pollution, noise pollution, traffic congestion and dangerous roads. Histon & Impington are about to lose their identity by the proposed sprawl of the building of such conurbations as Orchard Park. Consider redesigning or removing the noise barrier on the southern flank of the A14. Impington now has to live with the permanent roar of traffic from the A14 reflected off the wall at Arbury Park and into the village.

To ensure that Orchard Park is as sustainable, balanced and mixed community as possible, the re-allocation of non residential sites should not be promoted. The loss of employment sites is against South Cambridgeshire District Council's planning policy. This proposal to provide an additional 220 units on an already constrained and densely planned site results in the loss of non-residential uses, compromising the sustainability credentials of the development as it was originally planned. The result will inevitably be a less balanced community. The Council should seek other allocations elsewhere in order to make up the shortfall.

The three parcels were intended to provide a buffer to the A14 in response to noise and air quality issues. The retention of temporary noise barriers to the A14 will result in an unsatisfactory edge to Cambridge, clearly harming the sensitive Green Belt setting of Cambridge as a compact, historic city.

Infrastructure development is an absolute priority and must be properly in place before population growth on this scale is permitted. Includes inadequate road system (greater pressure on the already crowded Histon Road), open space, clean air, peace and quiet, safety for pedestrians and increasing numbers of cyclists, flooding. There are insufficient schools, doctors, dentists etc to support the impact of additional families in the area. Scaled down community services and scaled up residential use will lead

Council's Assessment

The Inspectors have considered the housing land supply in the district to 2016 and have identified a housing shortfall. They advise that unless new allocations are made to ensure this shortfall is met, the DPD will be found unsound. The Council therefore intends to recommend to the Inspectors the sites it would prefer to see allocated to address the shortfall, consistent with the development sequence set out in the Core Strategy with a focus on land on the edge of Cambridge. The principle of development on the Orchard Park site is already established and the proposed 3 sites for residential use would be alternative uses to those previously envisaged. The Council considers that residential development on the 3 sites identified at Orchard Park would be appropriate in principle having regard to its location on the edge of Cambridge within the urban area and the accessibility of this location to high quality public transport.

Orchard Park is located close to significant levels of existing employment and a primarily residential scheme is consistent with the approach being taken on the new urban extensions to Cambridge. The key is that these new neighbourhoods include the necessary community facilities and local services to support a sustainable development. The developments do not themselves necessarily need to include significant levels of employment development or other non-residential uses but the proximity to employment use and services and facilities and accessibility to them by non-car modes is important. This is the case at Orchard Park and a new local centre and community facilitates are included in the development. The Council is particularly mindful that these sites are at the top of the search sequence for housing and there is a need to identify additional sites for development to address a housing shortfall. An edge of Cambridge location is preferable to significant levels of new development in the villages which are at the bottom of the development sequence.

The issues of noise and air quality are clearly very important issues to be taken into account in allocation of the sites by the A14 for residential use and it is important to ensure that a satisfactory residential environment can be created. Any impact of the alternative form of development on the Air Quality Management Area (AQMA) is also an important consideration. These issues were explored in detail at the recent planning appeal on sites 1 and 2 with the benefit of technical evidence and the Inspector's report concludes that noise levels would be within acceptable limits both indoors and outdoors. The Inspector concluded that the proposal would provide a satisfactory environment in terms of air quality. She also concluded that the scheme itself would have an insignificant impact on air quality and on the AQMA.

The Council's aim when the Orchard Park site was originally allocated had been to secure protection for the residential development on the Orchard Park site through non-residential uses adjacent to the A14 and this drove the mixed use proposal. However, the permission for a scheme including residential development between sites 1 and 2 means that a portion of the barrier needs to be retained permanently. The Council recognises that a longer length of noise barrier than currently required to be retained permanently would be necessary but does not consider that the retention of half rather than a quarter of the barrier is so material that the site should not be allocated for residential. There are also ongoing discussions with the Highways Agency about the A14 Improvements and the implications for the noise barrier as a whole. The Council is aware of local concerns about reflected noise and this will be considered through the Council's discussions with the Highways Agency and developers about the future of the noise barrier.

Transport issues were also considered at the recent appeal inquiry and the Inspector concluded

Nature Representation Summary

to a deprived living habitat for residents.

If more housing is built at Orchard Park than proportionally more green space must be provided on site. Whilst it may be possible for many contributions to be made in terms of commuted sums, the ability to provide additional open space on the Orchard Park site, given the significant increase in numbers of units proposed, is questioned.

Council's Assessment

that residential development of sites 1 and 2 would be acceptable in transport terms. No concerns were raised about safety of the site from vehicles on the A14.

The use of the site for residential rather than employment use was considered at the appeal inquiry. The Inspector concluded that the loss of a limited amount of employment land in the context of an oversupply of high quality employment premises and a significant overall projected supply would not prejudice the Regional Plan or Core Strategy objectives in relation to employment land. The Council agrees with this view, particularly in the context that this site which is at the top of the search sequence for housing and there is a need to identify additional sites for development to address a housing shortfall.

The appeal inquiry also considered provision of open space. The Inspector concluded that there is not a shortage of open space on Arbury park itself as a result of the development of 900 homes. The Inspector agreed that commuted sums would be acceptable for these sites with provision of further open space provision being made nearby. Whilst provision of open space is normally preferred on site, the Council's Development Control Policies DPD Policy SF/10 required provision to be made either on site or through contributions for new provision or enhancements to new facilities. The supporting text advises that on site provision is generally preferable but it is not an absolute requirement. There may be more potential for on site provision in respect of site 3, which adjoins a proposed area of open space.

The Inspector also considered the impact and density of the development proposed on sites 1 and 2, which in the appeal proposal was for 182 dwellings across the two sites. Concerns were raised about the design of the proposed building and questions over its height. The Council has used a lower capacity figure, based on the scale and form of the adjoining, existing residential development for sites 1 and 2, which allow for 30 and 70 dwellings respectively. Whilst it is possible that a suitable scheme could come forward for a higher number, this is considered a reasonable robust capacity to use for the housing shortfall assessment. The capacity of site 3 for the purposes of the housing shortfall work is also deliberately conservative to ensure a robust approach. The actual numbers would be a matter of determination through a planning application and having regard to the context of the site.

The recent appeal decision confirmed that sites 1 and 2 are suitable in technical terms for residential development, having regard to a significant level of technical information and it is appropriate that they be allocated for residential use in the context of the housing shortfall, particularly having regard to the sustainability benefits of providing housing at this location at the top of the search sequence and with the benefit of good quality public transport provision.

Whilst site 3 does not have the benefit of the technical evidence available for sites 1 and 2, the findings of that evidence is helpful in supporting the proposal for residential use on this site. Detailed issues of noise, air quality and traffic impacts will clearly need to be considered for this site in the context of a detailed proposed but it is considered sufficiently likely that a satisfactory scheme can be achieved that it can be included to address the housing shortfall. In terms of traffic impact, there is greater certainty that the site can be accommodated once the A14 improvements are completed which the Highways Agency has advised is proposed to be in mid 2014, which will allow adequate time for this site to be developed by 2016 if traffic proved to be a constraints earlier.

Representations	Nature	Representation Summary	Council's Assessment
22712 - Cambridgeshire County Council	Object	As part of the major residential development at Orchard Park, the County Council supports the further development of the site with the following provisos: • That historic features of the site remain protected; • That the additional development takes account of the need for education and other community facilities, and maintains open spaces within the site; • That design features mitigate the adverse effects of the A14 wherever possible, particularly for Sites 1 and 2; • That green links towards open land to the west of the site, as shown in the Green infrastructure Strategy, can still be secured through this development.	The County Council's support in principle for the allocation of these sites is noted. All the issues raised are either addressed in the proposed policy and supporting text or can be dealt with through any planning application.
23260 - Natural England	Support	We have no specific concerns with regard to the following Preferred Sites - 1,2,3,6,10,11 in relation to potential impacts on nationally or internationally designated sites since there are no such sites in close proximity.	Support noted.
22654 - Gallagher Waterbeach Limited	Support	Support proposed allocation of Sites 1, 2, and 3.	Support noted.
22632	Support	Although I generally oppose development on greenfield sites, when it is necessary then development adjacent to existing development sites seems sensible. Therefore I support the proposed sites as described in the leaflet.	Support noted.
Site 4 : North West Cambrid	dge Area A	Action Plan	
22920 - Highways Agency	Object	The Highway Authority support in principle the provision of the 'Responding to a Housing Shortfall ' document. The Agency support this site in principle but would advise that further technical assessment is required regarding the impact on the Trunk Road Network of this site.	The Highways Agency's support for the NW Cambridge AAP site is noted. The separate examination process has considered transport issues relating to the site, and had regard to the findings of the NW Cambridge Transport Study which concluded that development of up to 2500 dwellings can be accommodated on this site, also having regard to development in the sector between Huntingdon Road and Histon Road. The Inspectors have identified a larger site option for further consideration and a supplement to the original Transport Study has been prepared which concludes that the larger site option can also be accommodated in transport terms subject to the maximum 40% modal share by car drivers required by the AAP. The AAP includes policies to ensure that development is acceptable in transport terms and a full Transport Assessment will need to accompany any planning application.

Representations	Nature	Representation Summary	Council's Assessment
22770	Object	The 910 homes is questionable. The University want a minimum of 4,500 dwellings on the total site (initially 2000-2500). Such a proposal is unsound. Brown and Norrish NW Cambridge Area Action Plan Green Belt Landscape Study Final Report May 2006 indicates that the strategic gap between Girton and Cambridge is key unit of Green Belt around Cambridge.	The site boundary and its overall capacity will be determined through the NW Cambridge AAP examination process and the respondent has made representations to that plan raising his concerns. The Submission AAP plans for 2000-2500 dwellings plus 2000 student units of accommodation. The University has made representations to the AAP seeking a minimum of 2500 dwellings plus 200 student units. The Inspectors have asked South Cambs and Cambridge City Councils (as it is a joint AAP) to undertake further work on a larger site option than could accommodate 3000 dwellings plus 2000 student units. The relevance of the AAP to the housing shortfall process is in terms of its housing contribution to count against the housing shortfall by 2016. That is particularly affected by the phasing of the development and in which district it falls at any point in the development and will not include the whole development.
22740 22854 - Cambridge Preservation Society 22637 22487 22589 22586 22635 22757 22930	Object	Respondents raise a variety of concerns about the principle of development on the NW Cambridge Area Action Plan site, including that development should not be allowed on this green field site and that it will have an adverse impact on the setting of Cambridge and concerns are raised about separation with Girton. Respondents also raise concerns that the Castle area of the City is already heavily populated and by allocating additional sites in this area it will make the situation much worse. Concerns are raised about traffic congestions currently experienced on Madingley Road and Huntingdon Road and the impact of significant new development. Concerns are raised about the lack of services and facilities in this area of the City and an emphasis that appropriate services and infrastructure would be required to serve the development, including appropriate open space provision. Concerns are also raised about noise and air quality given the proximity of the M11 and A14. Impact on biodiversity is also raised.	The NW Cambridge Area Action Plan is being prepared under a separate process and its relevance to the housing shortfall process is in terms of its housing contribution to count against the housing shortfall by 2016. Notwithstanding, the concerns raised by the respondents have been raised in representations to the NWCAAP by them or by others and are being considered by Inspectors through that separate examination process. The site included in the Submission NWCAAP sought to protect the setting of Cambridge by maintaining development at the top of the slope rising up away from the M11 and included a large central open space. That site would provide for 2000-2500 dwellings and other University related uses. The Inspectors will make the final decision on the site included in the adopted AAP and have asked that a further larger site option be considered that extends down the slope and narrows the central open space, that would accommodate 3000 dwellings. There will be 6-weeks public consultation on that larger site option starting on 9 March 2009. The AAP includes policies to ensure that the development provides local services and facilities to serve the new community, including a local centre and primary education. High Quality public transport is also required and car drivers must not exceed 40% of journeys to work by car in order to minimised impact on the highway network.

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23215 - RLW Estates

22942 - Martin Grant Homes Limited

22943 - Harcourt Developments Limited

22806 - Countryside Properties

(Special Projects) Limited 22510

22724 - Girton Parish Council

Object Most respondents question the assumption that the site can deliver 550 dwellings in South Cambs by 2016 and argue

that it is unrealistic because the capacity of the site has yet to be tested for soundness and that because the NW Cambridge Area Action Plan has not been adopted it is premature to assume this level of development. Some argue that the AAP site is too large and capacity should therefore be reduced. Some argue that the University has to provide a needs test for development and the number cannot therefore be relied on. It is suggested that the University's representation to the Submission NWCAAP should be used instead which shows 215 dwellings in South Cambs by 2016. However, Girton Parish Council argues that in order to meet the housing shortfall, additional pressure should be applied to the University to ensure as

many dwellings above the AAP estimate of 510 can be

brought forward on this site for 2016.

Council's Assessment

The Council has agreed the current position on the phasing and housing trajectory for the NWCAAP site with Cambridge University in an exchange of correspondence (February 2009, RD/NWExam/130 and 140). The Council's housing shortfall documents relied on the Submission NW Cambridge AAP housing trajectory which assumed that 550 dwellings would be completed in South Cambs by 2016 and assumed that there would be an early phase of development starting in the City and the site would be built out east to west. The University's representations to the AAP examination advised that development would start a year later than the AAP assumed, the early phase in the City not having been pursued, and this meant that there would be 215 dwellings completed in South Cambs by 2016.

The Inspector advised at the NWCAAP examination hearing that his preliminary view was that a start in 2012/13 was a reasonable position but he questioned whether as many dwellings could be completed in the first year in the City. This would have knock on implications for delivery in South Cambs. To look at a potential worse case scenario, it would be reasonable to look at the implications of a further years slip in completions in South Cambs which would give 65 dwellings by 2016. The reduction may not be as much as this, but it provides a robust basis to continue work on the housing shortfall. The Council is keen to ensure the maximum delivery possible on this site in South Cambs at the top of the search sequence by 2016 and would wish to explore this further with the University before the AAP examination is concluded, but it is considered to be a reasonable potential worst case scenario.

However, this should be viewed in the context of ongoing discussions with the University. The Inspectors have asked the Councils to carry out further work and public consultation on a larger site footprint option, which the Councils have agreed to undertake. Public consultation will take place between 9 March and 20 April. The University has indicated that if the larger site footprint were to be included in the adopted AAP, it may prefer a phasing plan where development starts around the local centre. This is due to the greater amount of development around the local centre which would affect the critical mass of development to support those facilities. The University has advised that a central start could deliver housing a year earlier in South Cambs and that it would anticipate that up to 800 dwellings would be completed in South Cambs by 2016 with this approach. Given the absence of community services and facilities in west Cambridge and the lessons learnt from the Orchard Park development, the Council supports the principle of a start around the proposed local centre, in view of the greater potential to create a sustainable community from the start.

It is understood that there are various factors influencing the University's decision on phasing of the development, including up front infrastructure costs. The University has also recently indicated that its position on a central start could also be dependent on the inclusion of a supermarket in the local centre. The University has advised that this would have the advantage of not requiring any market housing to deliver the first phase of development, which is particularly relevant in the current economic climate. The University has advised that it envisages a supermarket in the order of 2600-3250 sqm net. This range of is a significant size of superstore, comparable or potentially larger than the existing superstores in Cambridge, and the Council will clearly need to give proper consideration to this proposal with the City Council before being able to offer a view.

Therefore, at this time it is not possible to determine the housing trajectory for the AAP development with any certainty and therefore also the dwellings numbers that could be relied on to

Representations	Nature	Representation Summary	Council's Assessment
			be delivered in South Cambs to 2016. Delivery could be anywhere in the range 65 - 800 dwellings. The final AAP figure for South Cambs is the figure that should be included in the housing shortfall calculations and the Inspectors will be able to take this into account as they complete their binding Reports on both examinations. The Council will therefore have to work on the worst case scenario for the immediate matter of deciding its preferred sites to make up the housing shortfall, with the caveat that this could end up a higher number. Notwithstanding, the trajectory will need to be clearer for the final stages of the AAP examination. The Council will continue to work with the University and the City Council, as well as other partners to take forward this important issue with a view to assisting the University in coming to a firmer view that could be included in its representations to the forthcoming public consultation on the Inspectors' larger site option. The housing shortfall calculations therefore assume a worst case scenario of 65 dwellings
			competed in South Cambs by 2016, but the Council is hopeful that the final figure included in the adopted NWCAAP may well be higher.
23264 - Natural England	Object	Site 4 has the Travellers Rest Pit SSSI within the Area Action Plan boundary. Although issues associated with potential impacts of the development on this SSSI are currently being dealt with under the North West Cambridge Area Action Plan programme, your authority's DPD policies must recognise the national geological interest of this SSSI. A policy should be included to safeguard this site from development and ensure geodiversity enhancements are implemented as far as possible.	The NW Cambridge Area Action Plan is being prepared under a separate process and its relevance to the housing shortfall process is in terms of its housing contribution to count against the housing shortfall by 2016. That plan addresses the issues surrounding the protection of the SSSI. The SSSI also lies entirely within Cambridge City. This is not an issue for the housing shortfall process or the Site Specific Policies DPD.
22549 - Ely Group of Internal Drainage Boards	Object	The identified sites do not directly drain to Internal Drainage Districts within the Ely Group but have the potential to increase downstream run-off/flood risk that may impact on the surface water receiving system on which our Board rely. We therefore ask that a surface water strategy should be	The NW Cambridge Area Action Plan is being prepared under a separate process and its relevance to the housing shortfall process is in terms of its housing contribution to count against the housing shortfall by 2016. The AAP includes appropriate policies to ensure the development is acceptable in terms of surface water drainage. The Environment Agency was consulted on the preparation of the NW Cambridge Area Action Plan and was also consulted as part of the housing shortfall site assessment process. It has advised that it does not object to the allocation of this site on flood risk
		required for each site that considers the impact of each individual development on the wider/downstream catchment and that this strategy mitigates the effects of increased runoff to prevent adverse impact.	grounds. The EA will be a consultee on any future planning application.
		As the sites are quite remote from our area, we would expect the Environment Agency to be consulted to establish the requirement for each site.	

Representations	Nature	Representation Summary	Council's Assessment
22719 - Cambridgeshire County Council	Object	The County Council supports the development of the South Cambridgeshire part of the North-West Cambridge AAP area with the following provisos: • That there should be a high standard of design and landscaping to maintain and enhance the this part of the setting of the City; • That the green gap/corridor between Cambridge and Girton is maintained; • A target of 50% affordable housing is sought; • A target of 40% travel by sustainable means is sought; • That consideration is given to a possible need for a recycling centre within the AAP area; and • The possible need for a second primary school to serve the area.	The County Council's support is noted. The NW Cambridge Area Action Plan examination will address the points raised by the County Council. However, the AAP provides for all the issues raised with the exception of a recycling centre. A change to the wording of the AAP was agreed at the examination to allow for one or more primary schools, depending on the educational requirements identified once the child generation of the development is known once there is more certainty on the housing mix proposed and the lettings policy for the University key worker housing. The issue of a recycling centre, which would be to serve the whole of north Cambridge not just this site, is a matter for the Minerals and Waste LDF prepared by the County Council. It is not appropriate for the AAP to plan for waste. Furthermore, this location is not identified as a preferred location in the latest consultation documents for the Minerals and Waste DPD.
22633	Support	Although I generally oppose development on greenfield sites, when it is necessary then development adjacent to existing development sites seems sensible. Therefore I support the proposed sites as described in the leaflet.	Support noted.
22613 - Foxton Parish Council	Support	This development option is considered to be the most environmentally satisfactory solution to the identified needs of the University and local community.	Support noted.
22710 - Cambridge City Council	Support	Cambridge City Council support this site as a preferred option to provide 910 dwellings. An Area Action Plan for North West Cambridge has been prepared jointly by Cambridge City Council and South Cambridgeshire City Council which identifies land to be released from the Cambridge Green Belt to contribute towards the development needs of Cambridge University. The AAP allocates the overall site for various uses including 2,000 to 2,500 dwellings. The more detailed housing trajectory for the site provides the split of housing between South Cambridgeshire (910 dwellings) and Cambridge City (1,415 dwellings).	Support noted.

Representations

Nature Representation Summary

more rural areas.

Object

Council's Assessment

Site 6: Land between Huntingdon Road, Histon Road and the A14, North West Cambridge (Council's revised site boundary)

22511

There are too many contingencies to count on having 810 or even 270 units completed by 2016. Furthermore, overall housing density will be too great with the already proposed development on the Cambridge portion of the NIAB Site. No more than 500 units should be built on the South Cambs portion of the NIAB site and the shortfall should be

No more than 500 units should be built on the South Cambs portion of the NIAB site and the shortfall should be made up from other sites where housing development could be delivered by 2016 and where over development will not lead to the creation of unsustainable sites. Also, sites for Gypsy and Traveller pitches should be located in

There has been clarification provided by the Highways Agency on the phasing and timing of the A14 improvement scheme that affects the assumption of delivery on this site (RD/SSPExam/250). The HA has confirmed its intention to construct the central and eastern sections in parallel which means that the section between the Girton and Milton interchanges needed for development to come forward on the NIAB site will be completed by mid 2014. On this basis, there will be 21 months until the end of the plan period and on the delivery rate proposed by the respondent in its statements to the examination hearings (which equates to 30 dwellings per month), it is reasonable to rely on 630 dwellings to be completed by 2016.

In respect of Gypsy and Traveller provision, the proposal for provision at this major site is consistent with recent government policy and emerging regional policy. Government good practice guidance 'Designing Gypsy and Traveller Sites' states that, 'Where possible, sites should be developed near to housing for the settled community as part of mainstream residential developments.' GO-East wrote to local Councils on 3 December 2008 on the importance of meeting the accommodation needs of Gypsies and Travellers (RD/SSPExam/230). They say that there is a pressing need for DPDs containing site allocations for Gypsies and Travellers and that local authorities should consider the potential benefits that might be available through the incorporation of Gypsy and Traveller site proposals within wider site provision DPDs rather than being developed as stand alone DPDs and that this could deliver a framework more rapidly to assist the delivery of Gypsy and Traveller sites. They say it would be consistent with the policy emphasis on mainstreaming Gypsy and Traveller accommodation provision within general housing needs as well as helping to focus attention on the potential to deliver Gypsy and Traveller site provision as part of the S106 negotiation on major sites. The East of England Plan Single Issue Review for Gypsies and Travellers proposes a replacement to Policy H3 which sets specific targets for provision and states that local authorities should seek to secure provision as soon as possible through the development control process particularly when opportunities present themselves in respect of new major developments and through the preparation of Local Development Documents. The Panel Report of the Examination in Public (18 December 2008, RD/SSPExam/240) includes a section on provision through major developments (starting at paragraph 7.26). The Panel considers that there are locational advantages in linking some new site provision with major developments. This will help to mainstream Gypsy and Travellers site provision, seeing it as part of the affordable housing element of new residential and mixed developments. The report states that in so far as some Gypsies and Travellers have a preference for some detachment and rural locations, the Panel does not agree that this precludes suitably designed provision as part of major developments. For these reasons, the Council has taken a positive approach to specifically propose the inclusion of provision for Gypsy and Travellers as part of the affordable housing allocation at NIAB. This is entirely consistent with current and recently emerging national and regional advice. It is considered that appropriate provision for Gypsies and Travellers could be provided at the NIAB site through the masterplanning process.

Nature	Representation Summary	Council's Assessment
Object	The County Council supports the limited development of this site, with the following provisos: • That it enables land to be made available for a secondary school to serve the educational needs of north west Cambridge. • That consideration is given to a possible need for a recycling centre	The County Council's support to this site is noted. The proposed policy sets out the requirement for a secondary school to serve new development proposed in the whole of the north west quadrant. The timing of provision of the school should therefore be tied to development quantums coming forward across this site, the adjoining City site and the NW Cambridge AAP site. This should be made explicit in the proposed supporting text for the policy and a change is proposed to make this clear.
	New Green Infrastructure Site as shown in the Green infrastructure Strategy; and • That a buffer of open land is maintained between the	The issue of a recycling centre, which would be to serve the whole of north Cambridge not just this site, is a matter for the Minerals and Waste LDF prepared by the County Council. It is not appropriate for this DPD to plan for waste. Furthermore, this location is not identified as a preferred location in the latest consultation documents for the Minerals and Waste DPD.
	provides further mitigation.	The Green Infrastructure Strategy identifies land adjoining the NIAB site as a proposed Major New Green Infrastructure Site and describes it as "Strategic Open Space to north West of Cambridge with improved links to Girton, Impington, Histon and Cambridge". This is consistent with the proposed policy which requires the preparation of a Countryside Enhancement Strategy to provide landscape, biodiversity and public access enhancements in the surrounding countryside including links through the adjoining countryside and linking to areas beyond (subsections 16 and 11). The proposed policy also requires appropriate edge treatments that respect the Green Belt setting of Cambridge (subsection 3) and a landscape strategy to address the countryside edges of the urban extension to ensure a high quality environment is achieved (subsection 12).
		ACTION
		Add a new paragraph a.12A to read:
		"A secondary school is proposed on the site to serve the needs of all proposed new development in the north west part of Cambridge both north and south of Huntingdon Road. As such, the secondary school must be provided according to a trigger point relating to development in the whole quadrant, which may be ahead of development on the site in South Cambridgeshire. An appropriate mechanism will be included in the planning obligation for the site to ensure timely provision of this key community facility."
Object	We would resist vigorously any attempt to allow access to the new development through Windsor Road and any changes to the proposed pocket park at the end of Windsor Road.	The site in South Cambridgeshire will be accessed directly from the allocated site in Cambridge City and on to the new accesses proposed to Huntingdon Road and Histon Road. There is no proposal to alter the access arrangements for the City site, which do not include road access to Windsor Road.
	We would agree with Cllr Hipkin that it would be nice if the existing playing fields and pavilion could be conserved, but only if this is not at the expense of planned open space elsewhere.	
	Object	this site, with the following provisos: • That it enables land to be made available for a secondary school to serve the educational needs of north west Cambridge. • That consideration is given to a possible need for a recycling centre • That consideration is given to integration with a Major New Green Infrastructure Site as shown in the Green infrastructure Strategy; and • That a buffer of open land is maintained between the development and the A14, and that edge landscaping provides further mitigation. Object We would resist vigorously any attempt to allow access to the new development through Windsor Road and any changes to the proposed pocket park at the end of Windsor Road. We would agree with Clir Hipkin that it would be nice if the existing playing fields and pavilion could be conserved, but only if this is not at the expense of planned open space

Representations	Nature	Representation Summary	Council's Assessment
22693 22699 22936 - Martin Grant Homes Limited 22938 - Harcourt Developments Limited 22623 22609	Object	The delivery rates for this site (with or without early A14 improvements) seem to be far too optimistic. There is no certainty that the improvement works to the A14 will be completed in order to allow for a material amount of completions from this site within the plan period to 2016. Further allocations are needed if the shortfall is to be met.	There has been clarification provided by the Highways Agency on the phasing and timing of the A14 improvement scheme that affects the assumption of delivery on this site (RD/SSPExam/250). The HA has confirmed its intention to construct the central and eastern sections in parallel which means that the section between the Girton and Milton interchanges needed for development to come forward on the NIAB site will be completed by mid 2014. On this basis, there will be 21 months until the end of the plan period and on the delivery rate proposed by the respondent in its statements to the examination hearings (which equates to 30 dwellings per month), it is reasonable to rely on 630 dwellings to be completed by 2016.

Representations	Nature	Representation Summary	Council's Assessment
22713 - Cambridge City Council	Object	The City Council objects to the allocation of Site 6 for residential development on the basis that the release of Green Belt land in this location would be detrimental to the purposes of the Cambridge Green Belt, particularly the separation of Girton from Cambridge. This is supported by several Green Belt studies. Also, because it has not been proved that a suitable residential environment can be achieved in relation to air quality and noise, and because there will be a significant impact on the transport network as a result of the development.	The strategy for the Cambridge area is provided by the Structure Plan 2003 and confirmed in the East of England Plan 2008 and the South Cambridgeshire Core Strategy. This focuses development in and on the edge of Cambridge as being the most sustainable way of addressing the significant development needs of the area. The Structure Plan identifies the north west part of Cambridge as suitable for large scale development both north and south of Huntingdon Road, and it is for the LDF process to identify the appropriate sites for development and the policy requirements of the propped development. The Council id not initially identify the land between Huntingdon Road and Histon Road for development because there was an adequate supply of housing land and the contribution of the land to Green Belt purposes of setting and separation. However, in the context of a housing shortfall the Council has had to reach a view on the most sustainable sites for new allocations to meet that shortfall. In that context this site has been demonstrated to be one of the most sustainable sites. The site proposed by the Council retains a Green Belt separation between the site and Girton village of some 200m. This is comparable with the extent of Green Belt separation between Cambridge East and Teversham village provided by the Cambridge East Area Action Plan prepared jointly with the City Council and found to be sound by the Inspectors. It is true that a number of studies of the Green Belt have identified the scale and character of the agricultural landscape as important to Green Belt setting. However others have identified there to be some potential for development in this sector, which informed the Structure Plan identification of this location. The Cambridge Green Belt Study by LDA (2002, RD/GB/10) concluded that there is "Potential for some land between Cambridge and A14 to be sensitively developed. Setting and separation of Girton to be retained. Retain some open land between A14 and urban edge. Views from A14 to historic landmarks sho

Representations	Nature	Re
22738 22655 - Windsor Road Residents 22555 22659 22488 22501 22544 22565	Object	The the Sor alre res ma City dev
22590 22587 22636 22667 22703 23255		Sor cor par Ca tha coo
		Soi allo una no
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		Tra dev sys Hui leve cop eve net gui cor cyc and
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Nature Representation Summary

The Respondents raise a wide range of issues relating to the principle and detail of the proposed development. Some comment that the north west sector of the city is already heavily populated and could grow by 10000 - 12000 residents in the next 20 years. The cumulative effect of so many extra dwellings at the edge of one side of Cambridge City, over a short time-scale, represents a serious over-development and would overload the local infrastructure.

Some argue that up to 920 new homes on this site constitutes over development. Any development should be part of a fully integrated scheme to include the NIAB land in Cambridge City, and the scheme should allocate no more than 2000 homes in total. The Councils will have to cooperate much more closely and to demand significantly higher standards of developers.

Some consider that no further development should be allowed on the NIAB site when the situation is already unacceptable and further developments are under way with no plans for improvement of the infrastructure.

There is a general view that infrastructure development is an absolute priority and must be properly in place before population growth on this scale is permitted.

Transport is a key concern. Comments raised include that development on this scale requires a first rate transport system and that neither the Madingley Road nor the Huntingdon Road can deal with the vehicle flow at current levels and that the roads bordering the site will be unable to cope. The roads to the north west are already jammed every morning, there is no room for expansion of the road network, and the new areas are not being served by the guided bus. Development will greatly add to traffic congestion. It will increase the danger to pedestrians and cyclists and safe facilities will be needed for pedestrians and increasing numbers of cyclists.

Some argue that development will not enhance any community, it supports no facilities nor has close access to shops or other services. Further removal of habitat must have an impact on biodiversity, not only from the removal of land but the fragmentation of habitat. Green spaces for inhabitants are diminishing. Respondents raise other key issues, open space, clean air, peace and quiet, play areas

Council's Assessment

The strategy for the Cambridge area is provided by the Structure Plan 2003 and confirmed in the East of England Plan 2008 and the South Cambridgeshire Core Strategy. This focuses development in and on the edge of Cambridge as being the most sustainable way of addressing the significant development needs of the area in view of the importance of Cambridge as an employment location and the problems that have been caused by an increasing number of jobs compared with housing provision and the consequential increase in commuting into the City from outside and the congestion that causes. The Structure Plan identifies the north west part of Cambridge as suitable for large scale development both north and south of Huntingdon Road, and it is for the LDF process to identify the appropriate sites for development and the policy requirements of the propped development. The Council did not initially identify the land between Huntingdon Road and Histon Road for development because there was an adequate supply of housing land and the contribution of the land to Green Belt purposes of setting and separation. However, in the context of a housing shortfall the Council has had to reach a view on the most sustainable sites for new allocations to meet that shortfall. In that context this site has been demonstrated to be one of the most sustainable sites. Whilst the scale of development in the north west quadrant will be significant, this is a consequence of the urban focused approach and there are major scales of development proposed to the south and east of the City as well. The key is to ensure that the level of development can be accommodated in transport terms and that the development provides all the necessary services and facilities on site, or occasionally off-site if this would be more appropriate. There has been considerable partnership working with the City Council and other partners on this quadrant for a number of years, and this will continue. There will be a need for development on the site to integrate fully with the site in the City, for which there is already a planning application. The application includes measures that would integrate with the adjacent site in South Cambs, for example a reserve area at the local centre to provide an enhanced facility to serve development in both districts.

The proximity to Cambridge has the advantage of being able to provide high levels of travel by non car modes of bus, cycle and foot and the proposed policy requires that there be adequate highway capacity to serve all stages of development and High Quality Public Transport and convenient, safe, direct and convenient cycle and pedestrian routes. The NW Cambridge Transport Study (July 2007, RD/NW/70) concluded that the level of development proposed on the City NIAB site and the NW Cambridge AAP site, together with sensitivity testing for the South Cambs' NIAB site could work satisfactorily in transport terms, subject to achieving no more than a 40% modal share by car driverssubject to achieving no more than a 40% modal share by car drivers, and once the A14 improvements are completed for the section between Girton and Milton interchanges. A technical hearing has also been held for this site at which all parties, including the County Council and Highways Agency, agreed that a satisfactory transport solution was possible. Transport issues in the NW quadrant have also been explored recently in the NW Cambridge AAP examination. On reflection, the draft policy is not explicit on the modal share and this should be included as an additional requirement. A change is therefore proposed to the draft policy to reflect the policy in the NW Cambridge AAP.

The draft policy makes clear that the development must provide all necessary services, facilities and infrastructure to serve the day to day needs of the development either on site or elsewhere in North West Cambridge, planned to ensure the best form of provision. The policy proposes the provision of a secondary school. The school will meet the needs of all new development in the NW

Representations

Nature Representation Summary

are needed on sites to meet the needs of the residents. Noise and air pollution are already issues and will be exacerbated by the proposed development. Densities on the combined site should be reduced; one respondent suggests this could be achieved by locating the secondary school and playing fields in the South Cambs area. They say this would also allow considerably enhanced community and open space provision, for the benefit of both existing and new residents.

Concerned are raised about the impacts on flooding because the area has been subject to problems in the past. Balancing ponds are needed to ensure no flood risk to any new development and existing houses.

Council's Assessment

part of Cambridge and the provision of the school must be timed according to when it is needed to serve development anywhere in the quadrant. This should be made explicit in the proposed supporting text.

The technical hearing already held considered technical evidence which confirmed that a satisfactory development could be achieved in term of air quality, noise and drainage. The draft policy requires that open space is provided to meet local standards and appropriate measures must also be provided to ensure biodiversity is protected and enhanced.

ACTION

Include new subsection 8A to Policy SP/1a to read:

"8A Development and transport systems will be planned in order to integrate with adjoining development in Cambridge City, to reduce the need to travel and to maximise the use of sustainable transport modes to encourage people to move about by foot, cycle and bus, to achieve a modal share of no more than 40% of trips by car (excluding passengers). This will include the provision of car clubs, employee travel plans, residential travel planning, and other similar measures."

Include new paragraph a.12A to read:

"a.12A A secondary school is proposed on the site to serve the needs of all proposed new development in the north west part of Cambridge both north and south of Huntingdon Road. As such, the secondary school must be provided according to a trigger point relating to development in the whole quadrant, which may be ahead of development on the site in South Cambridgeshire. An appropriate mechanism will be included in the planning obligation for the site to ensure timely provision of this key community facility.

Representations	Nature	Representation Summary	Council's Assessment
22602 - The Wildlife Trust	Object	The Wildlife Trust objects to this development on the grounds that it fails to provide strategic green infrastructure as per the LDF Core Strategy, Cambridgeshire Green Infrastructure Strategy, Cambridge Nature Conservation Strategy and national policy. This area has been identified as having potential for major new green infrastructure and countryside enhancement in local policies. We feel that using it for housing development instead is not justified, especially considering that the completion of new homes within the desired time frame is not guaranteed. Should the proposed development go ahead, it must include adequate provision of strategic green infrastructure within the plans.	The strategy for the Cambridge area is provided by the Structure Plan 2003 and confirmed in the East of England Plan 2008 and the South Cambridgeshire Core Strategy. This focuses development in and on the edge of Cambridge as being the most sustainable way of addressing the significant development needs of the area. The Structure Plan identifies the north west part of Cambridge as suitable for large scale development both north and south of Huntingdon Road, and it is for the LDF process to identify the appropriate sites for development and the policy requirements of the propped development. The Council did not initially identify the land between Huntingdon Road and Histon Road for development because there was an adequate supply of housing land and the contribution of the land to Green Belt purposes of setting and separation. However, in the context of a housing shortfall the Council has had to reach a view on the most sustainable sites for new allocations to meet that shortfall. In that context this site has been demonstrated to be one of the most sustainable sites. In terms of delivery, there has been clarification provided by the Highways Agency on the phasing and timing of the A14 improvement scheme that provides greater clarity on the delivery on this site (RD/SSPExam/250). The HA has confirmed its intention to construct the central and eastern sections in parallel which means that the section between the Girton and Milton interchanges needed for development to come forward on the NIAB site will be completed by mid 2014. On this basis, there will be 21 months until the end of the plan period and on the delivery rate proposed by the respondent in its statements to the examination hearings (which equates to 30 dwellings per month), it is reasonable to rely on 630 dwellings to be completed by 2016. The Green Infrastructure Strategy identifies land adjoining the NIAB site as a proposed Major New Green Infrastructure Site and describes it as "Strategic Open Space to north West of Cambridge with improved links t
22857 - Cambridge Preservation Society	Object	The Society strongly objects to piecemeal development proposals and ad-hoc erosion of the Green Belt to the edge of Cambridge. It is considered that site 6 together with the NIAB site (already under development) and site 5 (a 'rejected site') are considered together in view of removing areas from the Green Belt and that an encompassing master plan with ample green space provisions from small pocket parks to country park-scale as well as recreational link to the countryside to the NE of the A14 should be created. Fragmenting the area by permitting solely site 6 to be developed for a Travellers site and housing development would prevent a coherent approach in the medium and long-term in this whole area (between A14 and Milton/Huntingdon Road) and thus creating a poorly sustainable urban extension.	The Council originally resisted the release of land from the Green Belt in this location and the allocated site in Cambridge City has progressed through the Cambridge Local Plan and is currently the subject of a planning application. In the context of the Inspectors' identified housing shortfall, the Council considers that this is one of the most sustainable sites for residential development and therefore proposes that the site be allocated. Whilst work on the City site is therefore well advanced, the site in South Cambs is promoted by the same developer and their proposals for the City site have been masterplanned to allow for the land in South Cambs to come forward in an integrated way. The site will need to bring forward all the supporting infrastructure needed by the development. Detailed consideration will need to be given to whether that provision is made on site or potentially in the adjoining City development, for example by enhancement of the local centre proposed in the City development if masterplanning determines that is the most appropriate and deliverable. Joint working is already established between the Councils, the County Council, Cambridgeshire Horizons and the developers of both this and the NW Cambridge AAP site to ensure that the developments in this quadrant are considered holistically.

Representations	Nature	Representation Summary	Council's Assessment
22674 23216 - RLW Estates 22523 22905 22904 22764 22808 - Countryside Properties (Special Projects) Limited 22931 22987 - Histon Parish Council	Object	This site performs an important Green Belt function and is important for the character and setting of the historic city of Cambridge when viewed from the A14. Development would compromise Green Belt purposes and coalescence would be created between the City and Girton and Histon & Impington. The Council has ignored the Brown Morrish NW Cambridge Area Action Plan Green Belt Landscape Study Final Report May 2006 which make key comments regarding this area. The erosion of the Green Belt for housing cannot be justified by exceptional circumstances Concerns are raised over the drainage, air quality, noise and traffic (including along the B1049 in Histon & Impington), and also the loss of productive agricultural land. The extent of delivery achievable by 2016 will be dependent on decisions regarding the timing of required upgrading of the A14 in this area. Delivery rates of 350 dwelling per annum are very unlikely and 200 dpa would be more realistic.	The Council has previously acknowledged that this area performs a Green Belt function and initially defended its release for development through the examination hearings. However, in the context of an identified housing shortfall, the Council has carried out a systematic and thorough site assessment process comparing the relative planning and sustainability merits of potential site options. In the context of the identification of this broad location in the Structure Plan for Green Belt release and its location at the top of the search sequence, the Council has concluded that it one of the most sustainable site options available to address the housing shortfall and has put it forward as a preferred site. However, the Council does not accept the larger site option put forward by the promoter of the site. A Technical Hearing has already been held at the examination which has tested the potential to provide a satisfactory scheme on the site in terms of transport, drainage, air quality and noise issues and agreement was reached between the Council, promoter and key stakeholders including the Highways Agency, County Council and Environment Agency that a suitable scheme would be able to be achieved. It was also agreed that delivery of the site was highly dependent on the completion of the part of the A14 improvement scheme between Girton and Milton junctions. There has been clarification provided by the Highways Agency on the phasing and timing of the A14 improvement scheme that affects the assumption of delivery on this site (RD/SSPExam/250). The HA has now confirmed its intention to construct the central and eastern sections in parallel which means that the section between the Girton and Milton interchanges needed for development to come forward on the NIAB site will be completed by mid 2014. On this basis, there will be 21 months until the end of the plan period and on the delivery rate proposed by the respondent in its statements to the examination hearings (which equates to 30 dwellings per month), it is reason
23256	Object	We accept that there is probably a need for more housing. What we are very concerned about is that we may get housing without any of the ameliorating features and amenities that make life pleasant for both present and future residents. The delays at Northstowe can have no possible connection with development of this site. Why should we be penalised by having to accept more houses because of delays in a project 15 miles away? Where is the sense in pushing through this scheme when housing developers have pulled out of Arbury Park because of the recession? No provision is being made to alleviate the congestion. Public transport needs to be dramatically improved - bigger buses and running on time.	The Council is obliged to provide adequate housing in the District as a whole to meet its housing targets, currently to 2016. Assumptions had been made on the housing provision at Northstowe by 2016 and delays in the delivery of the new town therefore affect housing provision in the district as a whole. This site is at the top of the search sequence in a location identified in the Structure Plan and therefore whilst the Council initially resisted the release of this site from the Green Belt because of its impacts, the comparative site assessments carried out have demonstrated that it is one of the most suitable sites available to the Council to address the housing shortfall. Whilst current market conditions are not favourable, the Council must still provide adequate housing land to meet its long term housing targets so that land is available to come forward when market conditions allow in view of the need for new housing. The proposed policy requires that any development provides High Quality Public Transport and all necessary supporting services and facilities. A technical hearing tested in some detail whether the site could be accommodated in transport terms and it concluded that it can once the A14 Improvement scheme is completed. The Highways Agency has advised that the relevant section of the A14 improvements will be completed in mid 2014 and it has been assumed that no development will come forward on this site before then.

Representations	Nature	Representation Summary	Council's Assessment
22921 - Highways Agency	Object	The Highway Agency supports in principle the provision of the 'Responding to a Housing Shortfall' document. The Agency would advise the Council that further work is required by the NIAB site developers to establish an acceptable quantum of NIAB development- related traffic that might access/egress the A14. The housing capacity figures for both the best and worst case scenarios are questioned.	It is recognised that a detailed Transport Assessment will be required to accompany any planning applications to demonstrate that the development can be accommodated in transport terms. However, the NW Cambridge Transport Study (July 2007, RD/NW/70) concluded that the level of development proposed on the City NIAB site and the NW Cambridge AAP site, together with sensitivity testing for the South Cambs' NIAB site could work satisfactorily in transport terms, subject to achieving no more than a 40% modal share by car drivers. A technical hearing has also been held for this site at which all parties, including the County Council and Highways Agency, agreed that a satisfactory transport solution was possible once the A14 Improvements are in place for the section between the Girton and Milton interchanges. Transport issues in the NW quadrant have also been explored recently in the NW Cambridge AAP examination. On reflection, the draft policy is not explicit on the modal share and this should be included as an additional requirement. A change is therefore proposed to the draft policy to reflect the policy in the NW Cambridge AAP. There has been clarification provided by the Highways Agency on the phasing and timing of the A14 improvement scheme that affects the assumption of delivery on this site (letter of 23 January 2009, RD/SSPExam/250). The HA has confirmed its intention to construct the central and eastern sections in parallel which means that the section between the Girton and Milton interchanges needed for development to come forward on the NIAB site will be completed by mid 2014. On this basis, there will be 21 months until the end of the plan period and on the delivery rate proposed by the respondent in its statements to the examination hearings (which equates to 30 dwellings per month), it is reasonable to rely on 630 dwellings to be completed by 2016.
			Include new subsection 8A to Policy SP/1a to read: "8A Development and transport systems will be planned in order to integrate with adjoining development in Cambridge City, to reduce the need to travel and to maximise the use of sustainable transport modes to encourage people to move about by foot, cycle and bus, to achieve a modal share of no more than 40% of trips by car (excluding passengers). This will include the provision of car clubs, employee travel plans, residential travel planning, and other similar measures."
22614 - Foxton Parish Council	Object	Support site 6/ Policy SP/1a but with reduced density to limit the impact on the green belt, allow for significant landscaping to the urban fringe and allow for noise and potential flooding abatement measures. Recommend limit of 475 dwellings.	Support for the site is noted. An average net density of 45 dwellings per hectare is proposed for the site for compatibility with the adjoining housing allocation in Cambridge City. Government guidance is for making the best use of land, particularly in sustainable locations with good public transport provision and the proposed density is consistent with that. It is also consistent with the Structure Plan policy that informed the development of policy for the major developments around Cambridge, albeit that it has now fallen away with the approval of the East of England Plan, which required that planned new communities should be significantly higher than 40 dwellings per hectare. Notwithstanding, the proposed policy for the site is clear that the development will be subject to a design-led approach to ensure it is appropriate for its location and surroundings. Even a national minimum density of 30 dwellings per hectare would yield 615 dwellings and that is considered too low for this urban location with proposed high quality public transport provision.

Representations	Nature	Representation Summary	Council's Assessment
23005	Object	The proposal to build up to 920 new homes on this site	The strategy for the Cambridge
22881		constitutes over development.	East of England Plan 2008 a
23006			development in and on the e
23007		Of the preferred sites, the 3 most serious contenders adjoin	significant development need
23008		or are near Castle. The north west sector of the city could	take place in villages which s
23009		grow by 10000 - 12000 residents in the next 20 years. Such	identifies the north west part
23010		enormous and rapid growth would overload the local	south of Huntingdon Road, a
23011		infrastructure and transform the area into a densely	development and the policy r
23012		urbanised suburb.	identify the land between Hui
23013			an adequate supply of housir
23014		The development should be part of a fully integrated	setting and separation. Howe
23015		scheme to include the NIAB land in Cambridge City, and	view on the most sustainable
23016		the scheme should allocate no more than 2000 homes.	has been demonstrated to be
23017			the north west quadrant will be
23018		Densities on the combined site should be reduced; this	and there are major scales of
23019		could be achieved by locating the secondary school and	key is to ensure that the leve
23020		playing fields in the South Cambs area. This would also	development provides all the
23021		allow considerably enhanced community and open space	would be more appropriate.
23022		provision, for the benefit of both existing and new residents.	and other partners on this qu
23023		provident, for the bottom of both exicting that new residence.	need for development on the
23024		Development on this scale requires a first rate transport	a planning application and th
23025		system.	(subsections 2, 3 and 11). The
23026		System.	site in South Cambs, for exa
23027			to serve development in both
23028			to provide high levels of trave
23029			requires that there be adequa
23030			Quality Public Transport and
23031			The NW Cambridge Transpo
23032			development proposed on the
23033			sensitivity testing for the Sou
23034			subject to achieving no more
23035			improvements are completed
23036			hearing has also been held for
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23038			Highways Agency, agreed th
			the NW quadrant have also be
23039			average net density of 45 dw
23040			adjoining housing allocation i
23041			land, particularly in sustainab
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23043			development of policy for the
23044			away with the approval of the
23045			should be significantly higher
23046			for the site is clear that the de
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dge area is provided by the Structure Plan 2003 and confirmed in the and the South Cambridgeshire Core Strategy. This focuses edge of Cambridge as being the most sustainable way of addressing the ds of the area and limits the amount of new development that should sit at the bottom of the development sequence. The Structure Plan t of Cambridge as suitable for large scale development both north and and it is for the LDF process to identify the appropriate sites for requirements of the proposed development. The Council did not initially untingdon Road and Histon Road for development because there was ing land and the contribution of the land to Green Belt purposes of rever, in the context of a housing shortfall the Council has had to reach a e sites for new allocations to meet that shortfall. In that context this site be one of the most sustainable sites. Whilst the scale of development in be significant, this is a consequence of the urban focused approach of development proposed to the south and east of the City as well. The el of development can be accommodated in transport terms and that the e necessary services and facilities on site, or occasionally off-site if this There has been considerable partnership working with the City Council uadrant for a number of years, and this will continue. There will be a e site to integrate fully with the site in the City, for which there is already he proposed policy includes a requirement that it be well integrated he application includes measures that would integrate with the adjacent ample a reserve area at the local centre to provide an enhanced facility th districts. The proximity to Cambridge has the advantage of being able rel by non car modes of bus, cycle and foot and the proposed policy uate highway capacity to serve all stages of development and High d convenient, safe, direct and convenient cycle and pedestrian routes. ort Study (July 2007, RD/NW/70) concluded that the level of ne City NIAB site and the NW Cambridge AAP site, together with uth Cambs' NIAB site could work satisfactorily in transport terms. re than a 40% modal share by car drivers and once the A14 ed for the section between Girton and Milton interchanges. A technical for this site at which all parties, including the County Council and hat a satisfactory transport solution was possible. Transport issues in been explored recently in the NW Cambridge AAP examination. An wellings per hectare is proposed for the site for compatibility with the in Cambridge City. Government guidance is for making the best use of ble locations with good public transport provision and the proposed at. It is also consistent with the Structure Plan policy that informed the e major developments around Cambridge, albeit that it has now fallen e East of England Plan, which required that planned new communities er than 40 dwellings per hectare. Notwithstanding, the proposed policy development will be subject to a design-led approach to ensure it is appropriate for its location and surroundings.

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		Site 6 : Land betw
Representations	Nature	Representation Summary
22522	Object	 (i) Consider the full NIAB site as a coherent matter. (ii) The present proposals are unacceptable over development of NIAB site. (iii) The plans do not presently represent a solution to the transport problems this development represents. (iv) Too much focus on achieving 'numbers of dwellings' independent of the cost to the quality of lives of our families. (v) The numbers of dwellings should be more like (2000-2500) for the whole site (with provision for schools and related resources in a lower density arrangement). (vi) Villages need to take their fair share too. We all need protecting from 'over development'. NB. The submission website requires that two questions are answered: (a) Do you consider the DPD is legally compliant? (b) 'Test(s) of Soundness' I do not wish to respond to those questions at this stage (other than as stated above). Please ignore my responses to those questions.

Council's Assessment

The strategy for the Cambridge area is provided by the Structure Plan 2003 and confirmed in the East of England Plan 2008 and the South Cambridgeshire Core Strategy. This focuses development in and on the edge of Cambridge as being the most sustainable way of addressing the significant development needs of the area and limits the amount of new development that should take place in villages which sit at the bottom of the development sequence. The Structure Plan identifies the north west part of Cambridge as suitable for large scale development both north and south of Huntingdon Road, and it is for the LDF process to identify the appropriate sites for development and the policy requirements of the proposed development. The Council did not initially identify the land between Huntingdon Road and Histon Road for development because there was an adequate supply of housing land and the contribution of the land to Green Belt purposes of setting and separation. However, in the context of a housing shortfall the Council has had to reach a view on the most sustainable sites for new allocations to meet that shortfall. In that context this site has been demonstrated to be one of the most sustainable sites. Whilst the scale of development in the north west quadrant will be significant, this is a consequence of the urban focused approach and there are major scales of development proposed to the south and east of the City as well. The key is to ensure that the level of development can be accommodated in transport terms and that the development provides all the necessary services and facilities on site, or occasionally off-site if this would be more appropriate.

There has been considerable partnership working with the City Council and other partners on this quadrant for a number of years, and this will continue. There will be a need for development on the site to integrate fully with the site in the City, for which there is already a planning application. The application includes measures that would integrate with the adjacent site in South Cambs, for example a reserve area at the local centre to provide an enhanced facility to serve development in both districts.

The proximity to Cambridge has the advantage of being able to provide high levels of travel by non car modes of bus, cycle and foot and the proposed policy requires that there be adequate highway capacity to serve all stages of development and High Quality Public Transport and convenient, safe, direct and convenient cycle and pedestrian routes. The NW Cambridge Transport Study (July 2007, RD/NW/70) concluded that the level of development proposed on the City NIAB site and the NW Cambridge AAP site, together with sensitivity testing for the South Cambs' NIAB site could work satisfactorily in transport terms, subject to achieving no more than a 40% modal share by car drivers and once the A14 improvements are completed for the section between Girton and Milton interchanges. A technical hearing has also been held for this site at which all parties, including the County Council and Highways Agency, agreed that a satisfactory transport solution was possible. Transport issues in the NW quadrant have also been explored recently in the NW Cambridge AAP examination.

An average net density of 45 dwellings per hectare is proposed for the site for compatibility with the adjoining housing allocation in Cambridge City. Government guidance is for making the best use of land, particularly in sustainable locations with good public transport provision and the proposed density is consistent with that. It is also consistent with the Structure Plan policy that informed the development of policy for the major developments around Cambridge, albeit that it has now fallen away with the approval of the East of England Plan, which required that planned new communities should be significantly higher than 40 dwellings per hectare. Notwithstanding, the proposed policy

Representations	Nature	Representation Summary	Council's Assessment
			for the site is clear that the development will be subject to a design-led approach to ensure it is appropriate for its location and surroundings.
22550 - Ely Group of Internal Drainage Boards	Object	The identified sites do not directly drain to Internal Drainage Districts within the Ely Group but have the potential to increase downstream run-off/flood risk that may impact on the surface water receiving system on which our Board rely. We therefore ask that a surface water strategy should be required for each site that considers the impact of each individual development on the wider/downstream catchment and that this strategy mitigates the effects of increased run-off to prevent adverse impact. As the sites are quite remote from our area, we would expect the Environment Agency to be consulted to establish the requirement for each site.	A technical hearing has been held by the Inspectors to address issues including drainage and evidence was provided by the promoters of the site. Agreement was reached between the Council and the Environment Agency that a suitable scheme could be identified that dealt with this important issue appropriately. The proposed policy requires a Strategic Surface Water Drainage Strategy that considers the impact of the development on the wider catchment, including having regard to other proposed development. The policy also requires that surface water drainage is controlled by means of a sustainable drainage system to drain NW Cambridge and that it will only release surface water run-off into the water courses surrounding NW Cambridge at an equal or slower rate than is the case prior to development. The Environment Agency was consulted as part of the site assessment process and advised: "We would have no objection to the allocation of this site on flood risk grounds. Any future applicant would be required to included a site specific flood risk assessment with any subsequent planning application in accordance with PPS25: Development and Flood Risk." The EA will be a consultee on any future planning application.
22574	Object	I would point out that the diagram of the proposed building site on green belt land between Huntingdon Road and Histon Road does not show that already assigned area for development at the NIAB area and north east section between the red area and the Cambridge Road Impington. This area should be shown as completely red and not mislead the public by only showing the future section.	It is acknowledged that the maps in the consultation material did not show the allocated site in Cambridge City and perhaps that could have been shown in some way to make clear it was not part of the consultation but was for information. The point is noted for any future similar consultations. However, all the written descriptions make it very clear that the site in South Cambridgeshire would form an extension to existing land allocated on adjoining land in the City, so it should have been clear that this is the case.

Representations	Nature	Representation Summary	Council's Assessment
22729 - Girton Parish Council	Object	The Council believe that this site performs an important Green Belt function in maintaining the Green Separation between the village of Girton and the city of Cambridge. The minor adjustments to the site boundaries as put forward as site 5 and this site do nothing to reduce the Parish Council's belief that development on the site will create de facto coalescence with Cambridge and ride over the District Council's policy of maintaining separation for the necklace villages. The objection also includes concerns over drainage, air quality traffic congestion and sustainable transport.	The strategy for the Cambridge area is provided by the Structure Plan 2003 and confirmed in the East of England Plan 2008 and the South Cambridgeshire Core Strategy. This focuses development in and on the edge of Cambridge as being the most sustainable way of addressing the significant development needs of the area. The Structure Plan identifies the north west part of Cambridge as suitable for large scale development both north and south of Huntingdon Road, and it is for the LDF process to identify the appropriate sites for development and the policy requirements of the propped development. The Council did not initially identify the land between Huntingdon Road and Histon Road for development because there was an adequate supply of housing land and the contribution of the land to Green Belt purposes of setting and separation. However, in the context of a housing shortfall the Council has had to reach a view on the most sustainable sites for new allocations to meet that shortfall. In that context this site has been demonstrated to be one of the most sustainable sites. The site proposed by the Council retains a Green Belt separation between the site and Girton village of some 200m. This is comparable with the extent of Green Belt separation between Cambridge East and Teversham village provided by the Cambridge East Area Action Plan that was found to be sound by the Inspectors. A technical hearing has been held to address issues of transport, noise, air quality and drainage and detailed evidence was provided by the promoters of the site. Agreement was reached between the Council and the Highways Agency, County Council and Environment Agency that a suitable scheme could be identified that dealt with these issues appropriately. For transport, that depends on the A14 improvement scheme being in place for the section between the Girton and Milton interchanges. There has been clarification provided by the Highways Agency on the phasing and timing of the A14 improvement scheme being in the late of the section and Milton

Representations	Nature	Representation Summary	Council's Assessment
22996 - Impington Parish Council	Object	Object, for the following reasons: Need to prevent coalescence of Girton, Impington and Cambridge. Need to protect character of historic city of Cambridge. Need to plan/monitor/manage traffic flows. Drainage of sites to the north of Cambridge is becoming increasingly problematic. Environmental quality. The area is impacted, if not covered, by an AQMA. The noise and air quality issues will only worsen. These sites abut existing sites for which detailed planning is already under way, designating these extra sites will require a re-evaluation of the neighbouring sites. IPC has discussed this site with the neighbouring Parish Council in Girton and strongly support their objection on the basis of the threat to the integrity of the village definition.	The strategy for the Cambridge area is provided by the Structure Plan 2003 and confirmed in the East of England Plan 2008 and the South Cambridgeshire Core Strategy. This focuses development in and on the edge of Cambridge as being the most sustainable way of addressing the significant development needs of the area. The Structure Plan identifies the north west part of Cambridge as suitable for large scale development both north and south of Huntingdon Road, and it is for the LDF process to identify the appropriate sites for development and the policy requirements of the propped development. The Council did not initially identify the land between Huntingdon Road and Histon Road for development because there was an adequate supply of housing land and the contribution of the land to Green Belt purposes of setting and separation. However, in the context of a housing shortfall the Council has had to reach a view on the most sustainable sites for new allocations to meet that shortfall. In that context this site has been demonstrated to be one of the most sustainable sites. The site proposed by the Council retains a Green Belt separation between the site and Girton village of some 200m. This is comparable with the extent of Green Belt separation between Cambridge East and Teversham village provided by the Cambridge East Area Action Plan prepared jointly with the City Council and found to be sound by the Inspectors. Whilst a number of studies of the Green Belt have identified the scale and character of the agricultural landscape as important to Green Belt setting, others have identified there to be some potential for development in this sector, which informed the Structure Plan identification of this location. The Cambridge Green Belt Study by LDA (2002, RD/GB/10) concluded that there is "Potential for some land between Cambridge and A14 to be sensitively developed. Setting and separation of Girton to be retained. Retain some open land between A14 and urban edge. Views from A14 to historic landmarks should be retained.
			A technical hearing has been held by the Inspectors to address issues of transport, noise, air quality and drainage and detailed evidence was provided by the promoters of the site. Agreement was reached between the Council and the Highways Agency, County Council and Environment Agency that a suitable scheme could be identified that dealt with these issues appropriately. For transport, that depends on the A14 improvement scheme being in place for the section between the Girton and Milton interchanges. There has been clarification provided by the Highways Agency on the phasing and timing of the A14 improvement scheme that affects the assumption of delivery on this site (RD/SSPExam/250). The HA has confirmed its intention to construct the central and eastern sections in parallel which means that the section between the Girton and Milton interchanges needed for development to come forward on the NIAB site will be completed by mid 2014. On this basis, there will be 21 months until the end of the plan period and on the delivery rate proposed by the respondent in its statements to the examination hearings (which equates to 30 dwellings per month), it is reasonable to rely on 630 dwellings to be completed by 2016.

Representations	Nature	Representation Summary	Council's Assessment
22944 - Barratt Strategic	Object	The land between Huntingdon Road, Histon Road and the A14 comprises a deliverable housing allocation within the plan period. An amendment to the site boundary to increase the developable area will ensure a comprehensive development of the site which accords with the technical evidence submitted and the principles advocated by the Authority. The Housing Trajectory will, as a consequence of the boundary amendment and the non delivery and delayed delivery of other sites identified by the Authority, need to be amended. Additionally the Sustainability Appraisal will require amendment to reflect a revised developable area.	The Council's site assessments concluded that the respondent's objection site could not be supported as a potential site to address the housing shortfall due to the impact on the Air Quality Management Area and on the separation with Histon and Impington but did support the revised are proposed by the Council for that purpose given the location on the edge of Cambridge at the top of the search sequence and identification of the location in saved Structure Plan policy P9/2c. The additional information submitted by the respondent does not change the Council's position. However, there has been clarification provided by the Highways Agency on the phasing and timing of the A14 improvement scheme that does affect the assumption of delivery on this site (RD/SSPExam/250). The HA has confirmed its intention to construct the central and eastern sections in parallel which means that the section between the Girton and Milton interchanges needed for development to come forward on the NIAB site will be completed by mid 2014. On this basis, there will be 21 months until the end of the plan period and on the delivery rate proposed by the respondent in its statements to the examination hearings (which equates to 30 dwellings per month), it is reasonable to rely on 630 dwellings to be completed by 2016.
23261 - Natural England	Support	We have no specific concerns with regard to the following Preferred Sites - 1,2,3,6,10,11 in relation to potential impacts on nationally or internationally designated sites since there are no such sites in close proximity.	Support noted.
22634	Support	Although I generally oppose development on greenfield sites, when it is necessary then development adjacent to existing development sites seems sensible. Therefore I support the proposed sites as described in the leaflet.	Support noted.
22761	Support	I object strongly to your proposals - except perhaps the 920 homes between Huntingdon Road and Histon.	Support noted.

Representations Nature Representation Summary Council's Assessment

Site 10: Powell's Garage, Woollards Lane, Great Shelford

22872 - English Heritage

Object

This site is in the heart of the Great Shelford Conservation Area and any development proposals will need to be undertaken with significant care to ensure that the Conservation Area is not harmed. The existing garage use contributes little to the Conservation Area and the redevelopment of the site therefore offers the opportunity for some enhancement. However in the Conservation Area Appraisal the former Board School building on the site is regarded as making a positive contribution and careful consideration will need to be given as to whether this building is retained and converted. English Heritage would like to be involved at an early stage in discussions on development of this site.

The Council recognises the concerns raised about the loss of the former Old British School building built in 1845, which retains a number of original features and makes a positive contribution to the Conservation Area despite the less sympathetic additions to the building. Those additions could be removed and it could be converted to residential use as part of any wider scheme on the site. The building is identified as a positive and focal building in the Great Shelford Conservation Area Appraisal (2007) which also advises that the site is part of an important view from Woollards Lane looking west to the High Street/Church Street junction. In accordance with PPG15 (paragraph 4.27), the general presumption should be in favour of retaining buildings that make a positive contribution to the character or appearance of a conservation area. The Secretary of State expects that proposals to demolish such buildings should be assessed against the same broad criteria as proposals to demolish listed buildings. As such, it would be appropriate for the proposed policy allocating the site to be strengthened to make clear that the starting point for considering any application is that the Old British School building should be retained in any residential scheme and that any proposal for its demolition would need to demonstrate that it was not viable to retain the building and that there are substantial benefits for the community that would decisively outweigh the loss resulting from demolition, particularly in terms of the architectural merits of the replacement buildina.

ACTION

Amend proposed policy SP/6b, section 2 to read:

"2. Development must preserve the character and appearance of the Conservation Area. The Old British School building should be retained and restored as part of any scheme. Any proposals for demolition of the building must demonstrate that it is not viable to retain the building and that there are substantial benefits for the community that decisively outweigh the loss resulting from demolition, particularly in terms of the architectural merits of the replacement building, which must provide a high quality landmark design in this sensitive location."

Amend the 6th sentence of proposed paragraph b.1 to read:

"...Any development proposal should retain and restore the former Old British School building and convert it to residential use as part of a wider scheme for the site.

Delete the last sentence of proposed paragraph b.2 and replace as follows:

"....The actual capacity would depend on design taking account of the character and constraints of the site but is anticipated to be in the order of 18 dwellings.

Representations	Nature	Representation Summary	Council's Assessment
22551 - Ely Group of Internal Drainage Boards	Object	The identified sites do not directly drain to Internal Drainage Districts within the Ely Group but have the potential to increase downstream run-off/flood risk that may impact on the surface water receiving system on which our Board rely. We therefore ask that a surface water strategy should be required for each site that considers the impact of each individual development on the wider/downstream catchment and that this strategy mitigates the effects of increased run-off to prevent adverse impact. As the sites are quite remote from our area, we would expect the Environment Agency to be consulted to establish the requirement for each site.	The site does not lie in the flood plain and the Environment Agency has raised no objection to its allocation. It has advised that any development would have to be sympathetic to the underlying major aquifer and that the site would require an appropriate investigation (and remediation scheme where appropriate) into any ground contaminants as a result of former use/s, but that it would expect an acceptable scheme to be capable of being achieved. It should be noted that a significant proportion of the site is covered by hard standing with the current garage use. Any proposal will need to comply with the policies contained in the Development Control Policies DPD relating to surface water drainage.

Representations	Nature	Representation Summary	Council's Assessment
22855 - Cambridge Preservation Society	Object	The Society supports improvements to the Conservation Area, however considers that the Old British School is retained and its setting is enhanced to merit the Conservation Area and the village core character. It is considered that this Building is of high local importance and as such should be retained whilst affording sensitive development to its rear. Thus the aim of achieving 20 homes may need to be reduced to permit retention of the Old British School.	The Council recognises the concerns raised about the loss of the former Old British School building built in 1845, which retains a number of original features and makes a positive contribution to the Conservation Area despite the less sympathetic additions to the building. Those additions could be removed and it could be converted to residential use as part of any wider scheme on the site. The building is identified as a positive and focal building in the Great Shelford Conservation Area Appraisal (2007) which also advises that the site is part of an important view from Woollards Lane looking west to the High Street/Church Street junction. In accordance with PPG15 (paragraph 4.27), the general presumption should be in favour of retaining buildings that make a positive contribution to the character or appearance of a conservation area. The Secretary of State expects that proposals to demolish such buildings should be assessed against the same broad criteria as proposals to demolish listed buildings. As such, it would be appropriate for the proposed policy allocating the site to be strengthened to make clear that the starting point for considering any application is that the Old British School building should be retained in any residential scheme and that any proposal for its demolition would need to demonstrate that it was not viable to retain the building and that there are substantial benefits for the community that would decisively outweigh the loss resulting from demolition, particularly in terms of the architectural merits of the replacement building.
			ACTION
			Amend proposed policy SP/6b, section 2 to read:
			"2. Development must preserve the character and appearance of the Conservation Area. The Old British School building should be retained and restored as part of any scheme. Any proposals for demolition of the building must demonstrate that it is not viable to retain the building and that there are substantial benefits for the community that decisively outweigh the loss resulting from demolition, particularly in terms of the architectural merits of the replacement building, which must provide a high quality landmark design in this sensitive location."
			Amend the 6th sentence of proposed paragraph b.1 to read:
			"Any development proposal should retain and restore the former Old British School building and convert it to residential use as part of a wider scheme for the site.
			Delete the last sentence of proposed paragraph b.2 and replace as follows:
			"The actual capacity would depend on design taking account of the character and constraints of the site but is anticipated to be in the order of 18 dwellings.

Representations	Nature	Representation Summary
00=10	2 11 <i>i</i>	
22513	Object	Some respondents argue that this site is of limited help to
22525 22495		the overall housing requirement. Some are concerned at
22508		the loss of an employment use that has been on this site for over 70 years. Concerns are that loss of the garage will
22583		gradually diminish important facilities in the village and
22578		could mean other businesses suffer and the village might
22626		lose shops such as The Deli, the green grocer, the baker
22627		and many others.
22657		and many outers.
22705		A number of respondents are concerned about pressure on
22748		local roads at peak times. They say traffic is already dense
22759		at busy times of day and that Little Shelford, in combination
22906		with Great Shelford, already suffers greatly from "cut
22788		through" traffic. Some say that cars are frequently parked
23277		all along (one side, and sometimes staggered along both
		sides of) Church Street making this road effectively a one-
		way street making it dangerous especially for cars and
		cyclists and outside the primary school.
		Some respondents are concerned that the proposal will
		increase flooding by paving and building on an area which
		regularly floods and increasing run off.
		A number of respondents are concerned that loss of the
		garage building, the former Old British School, which adds
		to the conservation nature of the area and retains a number
		of original features. It is argued that it should be saved and

junction.

perhaps divided to enhance the street scene on this

Council's Assessment

This site is clearly a relatively small site that makes a limited contribution to the housing shortfall. However, the previously developed site within the village framework of a Rural Centre is suitable in principle for residential development, subject to other policies. As it is no longer possible for the Council to include any allowance for windfall sites (unallocated sites that come forward for housing) every site that gains planning permission counts towards the Council's housing targets. The site has previously gained planning permission for residential use and the principle of loss of the residential use has already been established. The Council has not sought to identify and allocate potential windfall sites. However, where a site is known about, there is no reason why it should not be allocated if it is consistent with policy. The Powell Garage site is therefore proposed to be allocated to reflect the position that the site is suitable for housing and that it can reasonably be assumed that it will gain planning permission and contribute to housing provision in the district by 2016.

The Council consulted with the County Council as highway authority on the potential allocation of the site and they advised that it is likely that a satisfactory access could be achieved for the site from Church Street. The concerns raised by respondents would need to be addressed appropriately at the planning application stage.

The site does not lie in the flood plain and the Environment Agency has raised no objection to its allocation. It has advised that any development would have to be sympathetic to the underlying major aquifer and that the site would require an appropriate investigation (and remediation scheme where appropriate) into any ground contaminants as a result of former use/s, but that it would expect an acceptable scheme to be capable of being achieved. It should be noted that a significant proportion of the site is covered by hard standing with the current garage use.

The Council recognises the concerns raised about the loss of the former Old British School building built in 1845, which retains a number of original features and makes a positive contribution to the Conservation Area despite the less sympathetic additions to the building. Those additions could be removed and it could be converted to residential use as part of any wider scheme on the site. The building is identified as a positive and focal building in the Great Shelford Conservation Area Appraisal (2007) which also advises that the site is part of an important view from Woollards Lane looking west to the High Street/Church Street junction. In accordance with PPG15 (paragraph 4.27), the general presumption should be in favour of retaining buildings that make a positive contribution to the character or appearance of a conservation area. The Secretary of State expects that proposals to demolish such buildings should be assessed against the same broad criteria as proposals to demolish listed buildings. As such, it would be appropriate for the proposed policy allocating the site to be strengthened to make clear that the starting point for considering any application is that the Old British School building should be retained in any residential scheme and that any proposal for its demolition would need to demonstrate that it was not viable to retain the building and that there are substantial benefits for the community that would decisively outweigh the loss resulting from demolition, particularly in terms of the architectural merits of the replacement building. This would have implications for the capacity of the site, which was based on the original scheme for redevelopment of the site for retirement flats. In response to other representations, the Council is proposing an extension to the site to include residential land to the east. The area of the revised site is 0.44 ha. Using the Council's normal approach to capacity of 40 dwellings per hectare in more accessible locations close to services and facilities this gives 18 dwellings. This also seems a reasonable assessment for the larger site, having regard to the desirability of retaining the

Representations	Nature	Representation Summary	Council's Assessment
			existing building as part of any wider scheme.
			ACTION
			Amend proposed policy SP/6b, section 2 to read:
			"2. Development must preserve the character and appearance of the Conservation Area. The Old British School building should be retained and restored as part of any scheme. Any proposals for demolition of the building must demonstrate that it is not viable to retain the building and that there are substantial benefits for the community that decisively outweigh the loss resulting from demolition, particularly in terms of the architectural merits of the replacement building, which must provide a high quality landmark design in this sensitive location."
			Amend the 6th sentence of proposed paragraph b.1 to read:
			"Any development proposal should retain and restore the former Old British School building and convert it to residential use as part of a wider scheme for the site.
			Delete the last sentence of proposed paragraph b.2 and replace as follows:
			"The actual capacity would depend on design taking account of the character and constraints of the site but is anticipated to be in the order of 18 dwellings.
23217 - RLW Estates	Object	Although allocation of this site could potentially be consistent with the Core Strategy DPD there is concern that reliance on such sites, even to a relatively small degree, is seen as supporting the dispersal of growth towards the rural areas, which are inherently less sustainable than other options in the hierarchy. Certainly were other sites at the top of the search sequence rejected through this process it would not be acceptable to rely on a number of similar options elsewhere in the District	This previously developed site within the village framework of a Rural Centre is suitable in principle for residential development, subject to other policies. As it is no longer possible for the Council to include any allowance for windfall sites (unallocated sites that come forward for housing) every site that gains planning permission counts towards the Council's housing targets. The site has previously gained planning permission for residential use and the principle of loss of the residential use has already been established. The Council has not sought to identify and allocate potential windfall sites. However, where a site is known about, there is no reason why it should not be allocated if it is consistent with policy. The Powell Garage site is therefore proposed to be allocated to reflect the position that the site is suitable for housing and that it can reasonably be assumed that it will gain planning permission and contribute to housing provision in the district by 2016.
		to meet the growing shortfall, as this would severely damage the pursuit of sustainable development.	

Representations	Nature	Representation Summary	Council's Assessment
22933 22935	Object	The site area could be extended to include adjacent land in the same ownership, which would allow for a comprehensive residential redevelopment scheme to be implemented.	The Council consulted on a proposed allocation on the site put forward as an objection to the Site Specific Policies DPD. The larger site put forward by the respondents relates, in the main, to adjoining land that has previously formed part of an area that together with the garage site has had planning permission for residential development and can be supported as a larger allocation to help address the housing shortfall. However, the site now put forward also includes a shop unit fronting onto Woollards Lane. The shop unit forms part of Great Shelford local centre and must be retained in retail use. It should not be included in the residential allocation. Any proposals for redevelopment or replacement of the retail unit as part the residential proposal would be better addressed through the planning application process where the impact on the local centre and the relationship with any residential scheme can be properly considered through a detailed proposal having regard to all relevant policy considerations and it would not be appropriate to establish that principle in policy terms through inclusion in the residential allocation. The amended site would be 0.44 ha.
			ACTION
			Revise site boundary of preferred site to include land to the east as shown on Map 2 (at the end of this appendix).
			Amend proposed policy SP/6b, part 1 to read:
			"1. An area of 0.44ha on Woollards Lane, Great Shelford,"
22503 - Autoquick	Object	Powells garage has been a commercial operation since the 1920's. The current occupiers Autoquick have been on the site for 17years and have provided local people with good service and employement. Any change of use would be contrary to your Local Plan of 2004 Policy EM8 which supports village buisness. I would hope that if you allow permission to build on this site you would give thought to where Autoquick might relocate as failure to either purchase ,relet or relocate would force us out of buisness and make all of our staff redundant. Autoquick has a million pound turnover employing 8 staff.	The Council has some sympathy with the respondent's concerns. However, it has responded to representations made to the Submission Site Specific Policies DPD by the landowner of the site seeking its allocation for residential use. The site is previously developed land within the village framework of a Rural Centre and therefore the principle of redevelopment is acceptable, subject to other policies. The landowners of this site have previously gained planning permission for this site for redevelopment for residential use and, whilst that has expired, they have sought the allocation of the site for residential through the LDF process. Whilst the use does provide some employment in the village and adjoins the village centre, it is a non-conforming use adjoining residential development and redevelopment for residential use could have benefits for residential amenity, help improve the character and appearance of this important corner site in the Conservation Area, as well as provide additional custom for the local centre.
22498	Object	Housing on the site to be 'affordable'.	The Council's affordable housing policy, included in the Development Control Policies DPD, will apply to this site which will require provision of at least 40% affordable housing, subject to viability considerations.

Representations	Nature	Representation Summary	Council's Assessment
22584	Support	This site is in commercial use but has had outline planning permission for retirement homes. It is sited on a key junction in the village and is important in the village streetscape.	Support noted.
		Development would enhance the village visually and if used for retirment homes socially. High density retirement housing would optimise the use of the site. The main building on the site is the old village school and a development which incorporated this would be desirable.	
		I support this site for additional housing as having the potential to contribute to the development of the village.	
22934	Support	The proposed allocation is supported, as it would facilitate the redevelopment of an incongruous garage use in the focal area of the village.	Support noted.
22629	Support	At last some common sense housing ideas i.e. to use infill sites rather than wasting green belt land.	Support noted.
		On a personal note, being resident of Great Shelford, I hope that the 20 houses at the Powell's garage site will be strongly considered for older residents council housing or older residents very affordable housing, of which there is a dearth in the actual village. Great Shelford is such a community with varying health clinics and shops and apart from 'The Peacocks' there is no-where within the actual village for older people to live so they can walk to shops and health facilities.	
22615 - Foxton Parish Council	Support	Support proposed change of use. Recommend preservation and conversion of old British school building on site to provide dwelling units within a reduced density to provide a total of 15 dwellings on the site.	Support noted.
22500	Support	Houses are better suited to the site than a garage. 20 houses max, 15 if we want to keep the site a little more exclusive.	Support noted.
22922 - Highways Agency	Support	The Highway Agency would support the provision of circa 20 dwellings within the village of Great Shelford. The change of use of this site from a garage to housing may generate fewer trips on the locat highway network, especially during peak periods, and is unlikely to have a material impact upon the Trunk Road Network (TRN).	Support noted.
22631	Support	I fully support the redevelopment of brownfield sites such as Powell's Garage.	Support noted.

Representations	Nature	Representation Summary	Council's Assessment
22596	Support	The site is in commercial use but has had outline permission for retirement homes. It is sited on a key junction in the village and is important in the village streetscape.	Support noted.
		Development could enhance the village visually and if used for retirement homes, socially. High density retirement housing could optimise the use of the site. The main building on the site is the old village school and a development which incorporated this would be desirable.	
		I support this site for additional housing as having the potential to contribute to the development of the village.	
22497	Support	Am happy for this to go ahead. Site is currently unattractive. Housing would be close to centre of village and would ensure more support for local shops, thus contributing to viability of village community. Two caveats: housing must be interesting and varied, ie of different sizes and not all the same. Secondly, village will probably not miss car sales; however not always a good idea to replace business with housing as want to keep employment in village.	Support noted.
23262 - Natural England	Support	We have no specific concerns with regard to the following Preferred Sites - 1,2,3,6,10,11 in relation to potential impacts on nationally or internationally designated sites since there are no such sites in close proximity.	Support noted.
22932	Support	The proposed allocation is supported, as it would facilitate the redevelopment of an incongruous garage use in the focal area of the village.	Support noted.
22537 - Great Shelford Parish Council	Support	The site of Powell's garage has been approved for residential development in the past and therefore the council has no objection to its inclusion. However the Old British School which stands on the site is a significant building in the street scene. It still retains many of its original features and is of sound construction. The Parish Council believes that the original building should be retained and converted to residential use; a view shared by many residents in the village and would hope serious consideration will be given to this proposal.	Support noted.
22733 - Cambridgeshire County Council	Support	The county council has no strategic comments on this site.	Comments noted.

Representations	Nature	Representation Summary	Council's Assessment
Site 11 : Ida Darwin Hospit	al, Fulboi	urn	
22540 - Cambridge Steiner School	Object	We own the lease on the Windmill Site and would like to point out that we should not be included within the Proposed Development area at the present moment in time. We can see possible advantages to there being a housing development on site, and would like to know what interest the Council and/or developers see in there being a Steiner School and Kindergartens in this area. Our concerns relate to noise levels and interruptions to services during building, whilst there is a longer term issue here of increased traffic, road safety, and parking close to the school.	This representation raises matters of detail which can be addressed at the time that planning applications for development are being considered and addressed by layout, design and planning conditions. ACTION Revise the site boundary to exclude the Windmill School site as shown on Map 1 (at the end of this appendix). (The floorspace calculations did not include this site or the Mental Health Trust's Cook/Chill building and therefore there are no implications for site capacity).
22940 - Martin Grant Homes Limited 22941 - Harcourt Developments Limited 22809 - Countryside Properties (Special Projects) Limited	Object		Being no longer required for healthcare purposes, national planning policy in PPG2: Green Belts allows for redevelopment for other purposes. Development Control Policies DPD Policy GB/4 builds on the guidance in PPG2 on previously developed sites in the Green Belt to provide for development which will have no worse impact on the Green Belt than the existing development. The Mental Health Trust is currently exploring its future health care provision at Fulbourn, and the potential for residential development on part of the Ida Darwin site. They anticipate completion of a master plan in Spring 2009. They currently anticipate that the majority of the Ida Darwin site could be redeveloped by 2016, with a combination of residential development and new open space. The exact capacity will depend on the trade off of floor space detailed earlier in this appraisal, and the detailed design of the site. The Trust indicate a phased approach to development, with the majority of the site available for redevelopment prior to 2016. A figure of 215 dwellings has been utilised, based on the lower 250 dwellings figure allowing minus 15% of the site to come forward post 2016 (as indicated in their illustrative masterplan August 2008). This is considered to be a robust minimum figure for land supply purposes.

Representations	Nature	Representation Summary	Council's Assessment
Tiop: escitations	1100000		
22873 - English Heritage	Object	No objection in principle to redevelopment but English Heritage concerned about - Immediately to the north of the site is a scheduled monument and it may be that the archaeological potential extends further south of the railway into the site. Advice should be sought from County Archaeologist on potential interest; In order to bring this site forward for development it will be necessary to relocate some of the office functions into new structures within the adjacent Fulbourn Hospital Conservation Area. English Heritage would like to know more about these to ensure that they do not result in harm to the Conservation Area; It is noted that there will be a green wedge of undeveloped land at the west end of the site, to retain separation between the new housing and the Conservation Area. It is important that this wedge is sufficient to achieve this purpose.	"No objection in principal" is noted. The County Archaeologist has advised that given that the site has been previously developed there would be no objection to development subject to appropriate investigations during the development. In considering planning applications for development at the Fulbourn Hospital site, the District Council will have regard to its stated intentions to protect and enhance the Conservation Area.
23218 - RLW Estates	Object	The form and scale of redevelopment envisaged would reduce the openness of the Green Belt in this area, contrary to national and LDF policies, particularly when combined with the related increase in development within the Fulbourn Hospital site that is also referred to. This conflicts with the cumulative element of Policy GB/4, whilst creation of an arbitrary gap between the two developments would do little to balance the undoubted increase in density of development that is proposed. In combination these considerations represent a significant departure from accepted Green Belt principles, which is not provided for in the Core Streton.	National and local policy in PPG2: Green Belts and Development Control Policies DPD Policy GB/4 will ensure that the overall impact of additional mental healthcare development on the Fulbourn Hospital site and housing development on that part of the Ida Darwin Hospital site adjoining Fulbourn village will be compensated for by clearance of development from the western part of the Ida Darwin Hospital site.
22567	Object	On recent plans for development in Fulbourn the Local Council have turned down all applications to keep the village as a village and not to have further growth to join Fulbourn to Cherry Hinton and Cambridge. With the closure of Brookfield hospital for patients who need rehabilitation why don't the existing wards at the Ida Darwin be used for this as these wards were built for this purpose. If this site is built on it will in time mean that Fulbourn will be joined to Cherry Hinton and Fulbourn will lose its identity as a village and the site would not be advantageous to the village shops as Tesco's is only 800yards away. Reconsider this site for new development.	Fulbourn was designated a Rural Centre by the Inspectors who examined the Core Strategy. Even with the development of additional in-patient mental healthcare on the Fulbourn Hospital site and housing development adjoining Fulbourn village, an effective green belt will be maintained between Fulbourn and Cambridge by ensuring that even with the proposed re-configuration of development that overall there is no material change to the amount of development. The Mental Health Trust has advised that efficient mental healthcare can only be provided by concentrating in-patient facilities onto a single site.

Representations	Nature	Representation Summary	Council's Assessment
22856 - Cambridge Preservation Society	Object	The Society supports redevelopment of this area to enhance the setting of Fulbourn village as well as Fulbourn Hospital site. It must be ensured that there is adequate green space provided on site, sensitive boundary treatment to the edge with the countryside and the Green Belt is provided as well as a significant gap between Fulbourn village and Cherry Hinton/Fulbourn Hospital site to ensure the distinctiveness of the respective communities and in particular Fulbourn village. The disused railway line should be retained and not be built on. Also the setting with the road - Old Fulbourn Drift - must be enhanced.	Support noted. Many of the matters raised concern how the site is redeveloped and can be addressed at the site planning stage. The "disused railway" is still in active use as a railway.
22714 - Cambridge City Council	Object	The City Council objects to the development of 215 dwellings on land at Ida Darwin Hospital because this would be detrimental to the purposes of the Cambridge Green Belt, particularly the separation of Fulbourn from Cambridge. In line with PPG2, any redevelopment should where possible have less impact on the purposes of the Green Belt and its openness than the previous development. This could be achieved by creating a 200m buffer of completely open space between the new buildings and the existing Business Park. This may have the effect of reducing the capacity of the site for housing.	The purposes for including the Ida Darwin Hospital site in the Cambridge Green Belt will not be harmed by the proposed housing redevelopment. National and local policy in PPG2: Green Belts and Development Control Policies DPD Policy GB/4 will ensure that the overall impact of additional mental healthcare development on the Fulbourn Hospital site and housing development on that part of the Ida Darwin Hospital site adjoining Fulbourn village will be compensated for by clearance of development from the western part of the Ida Darwin Hospital site.

Representations Nature Representation Summary	Council's Assessment
22554 Object 1) The transport implications: real safety issues are involved because of the limited road access 2) Inadequate public transport to support such a development 3) No thought given to impact on local facilities 4) The impact on the Green Belt and on the character of Fulbourn is unacceptable.	Traffic: The County Council as highways authority advises that the traffic that will be generated by housing development will be off-set in some measure by the loss of traffic generated by the existing uses on the Ida Darwin Hospital site. Public Transport: Fulbourn village is served by the Citi 1 bus service which provides a 20 minute frequency of service. The timetabled journey time from Fulbourn to Cambridge city centre is 50 minutes and takes considerably longer during peak hours. However, the Council has already maximised the amount of housing development that it can allocate on the edge of Cambridge. Fulbourn is one of 3 Rural Centres close to Cambridge from which bus journeys will be shorter than most of South Cambridgeshire's villages and cycling is also a viable alternative. Local facilities: Any shortfall in the capacity of village services and facilities required by the development will be matters which can be addressed through the normal process of developer contributions. Green Belt and character of Fulbourn: National and local policy in PPG2: Green Belts and Development Control Policies DPD Policy GB/4 will ensure that the overall impact of additional mental healthcare development on the Fulbourn Hospital site and housing development on that part of the Ida Darwin Hospital site adjoining Fulbourn village will be compensated for by clearance of development from the western part of the Ida Darwin Hospital site. Being located on the western edge of the village, development will have little impact on the overall character of the village.

Representations	Nature	Representation Summary	Council's Assessment
22579	Object	I object to the allocation of the Ida Darwin site in Fulbourn for the very large scale residential redevelopment that is proposed. People living there would not regard themselves as part of Fulbourn as it is very much on the village outskirts and it would act as an unwelcome and unsightly visual link across to Cherry Hinton. That number of houses on top of developments already underway or recently completed would place an unsustainable strain on services and infrastructure. Although a Rural Centre, Fulbourn is simply not equipped to cater for this number of extra inhabitants. It is Green Belt and would contravene the Master Plan for the Hospital site. Further erosion by dense large scale development is most likely in time to open up adjoining areas for similar development with arguments against less easy to make by reason of that. This is an opportunity to create a meaningful green corridor between the village and the Hospital and not seen as a way of raising finance fora cash strapped Health Trust who happen to own property that is no longer fit for its own purposes that in the first place was permitted for a very special health use that would otherwise have not been allowed. To proceed in the way proposed would in my view be a misuse of planning powers and the proposal on the scale envisaged should be resisted.	Rural Centre: Housing development on the eastern part of the Ida Darwin Hospital site will be no further from the village centre than in many of South Cambridgeshire's larger villages and should there be any shortfall in the capacity of village services and facilities required by the development, these will be matters which can be addressed through the normal process of developer contributions. Green Belt and Green Corridor: The Ida Darwin Hospital site is part of an identified Major Developed Site in the Green where local and national planning policies allow for redevelopment which in summary would: (a) have no greater impact than the existing development on the openness of the Green Belt;(b) contribute to the achievement of the objectives for the use of land in Green Belts (c) not exceed the height of the existing buildings; and (d) not occupy a larger area of the site than the existing buildings. In this case concentrating housing development adjoining Fulbourn village will allow the western and higher part of the Ida Darwin Hospital site to be cleared of development.
22524	Object	My objection is based on the adverse impact the additional traffic generated will have on the adjacent road system.	The County Council as highways authority advises that the traffic that will be generated by housing development will be off-set in some measure by the loss of traffic generated by the existing uses on the Ida Darwin Hospital site.
22945 - Barratt Strategic	Object	The Ida Darwin Hospital site is included as one of the 16 sites subject to a full Sustainability Appraisal even though it is in the Green Belt. There is no policy framework in the East of England Plan or the Core Strategy to support this Green Belt site rising in the hierarchy for consideration for housing.	The Ida Darwin Hospital forms part of a Major Developed Site in the Green Belt where national and local policies allow for redevelopment without any changes to green belt boundaries, including for housing development. The scale of housing development proposed is not strategic and would not therefore be a matter for the East of England Plan or the Core Strategy. It is however the subject of policy GB/4 in the Development Control Policies DPD and would adjoin the Rural Centre of Fulbourn.

Representations	Nature	Representation Summary	Council's Assessment
22552 - Ely Group of Internal Drainage Boards	Object	The identified sites do not directly drain to Internal Drainage Districts within the Ely Group but have the potential to increase downstream run-off/flood risk that may impact on the surface water receiving system on which our Board rely. We therefore ask that a surface water strategy should be required for each site that considers the impact of each individual development on the wider/downstream catchment and that this strategy mitigates the effects of increased runoff to prevent adverse impact. As the sites are quite remote from our area, we would expect the Environment Agency to be consulted to establish the requirement for each site.	Being located in Flood Zone 1 (land which has a less than a 1 in 1000 annual probability (chance) of flooding), a flood risk assessment will be required. Should that assessment identify any downstream risks, those risks will be migrated at the expense of the development.
22791 - Fulbourn Parish Council	Object	Fulbourn Parish Council objects to further large scale development proposed for the village on the Ida Darwin site. The village is already accepting further houses on the Windmill development and at Thomas Road. The Ida Darwin site would have a detrimental impact on the existing services - drainage, sewage system and the surrounding roads are not suitable for an increase in traffic. The site concerned is in the Green Belt. Housing, especially at the density envisaged, is not an appropriate re-use of land within the Green Belt, even if it is brownfield land. The village has been selected to contribute towards a shortfall which was originally designated for urban areas. This is contrary to paragraphs 2.7 and 4.10 of the Core Strategy. Of the 5 Rural Centres examined only Fulbourn emerges to take substantial growth.	Being located on the western edge of the village, development will have little impact on the overall character of the village. The Council has already maximised the amount of housing development that it can allocate on the edge of Cambridge. Fulbourn is one of 3 Rural Centres close to Cambridge from which journeys into Cambridge which is the main focus of employment will be shorter than most of South Cambridgeshire's villages and cycling is also a viable alternative. Housing development on the eastern end of the Ida Darwin Hospital site would be just over 1 kilometre from the village centre and primary school and therefore within the acknowledged limit of 2 kilometres for walking and well within cycling distance. Any shortfall in the capacity of village services and facilities required by the development will be matters which can be addressed through the normal process of developer contributions. The purposes for including the Ida Darwin Hospital site in the Cambridge Green Belt will not be harmed by the proposed housing redevelopment. National and local policy in PPG2 "Green Belts" and Development Control Policies DPD policy GB/4 will ensure that the overall impact of additional mental healthcare development on the Fulbourn Hospital site and housing development on that part of the Ida Darwin Hospital site adjoining Fulbourn village will be compensated for by clearance of development from the western part of the Ida Darwin Hospital site. The Core Strategy proposes a sequential approach to development (a) on the edge of Cambridge, (b) at Northstowe and (v) in the rural area in Rural Centres and other villages. The Council has identified all possible sites on the edge of Cambridge as part of the meeting the shortfall search, including sites previously rejected because of impact on the Green Belt. The Inspectors have already concluded that there will be no additional capacity at Northstowe before 2016. The Rural Centres are the next most sustainable locations for development of which Fulbourn, Histon/Impington a

Representations	Nature	Representation Summary	Council's Assessment
22864	Object	This development would change the nature of the village, virtually joining it to Cherry Hinton. We do not have the infrastrure to support the increased number of residents. The land was never meant to be used for residential.	Being located on the western edge of the village, development will have little impact on the overall character of the village. Being one of South Cambridgeshire's large villages with a good range of local service and facilities including a 20 minute frequency bus service to Cambridge, Fulbourn was designated a Rural Centre by the Inspectors who examined the Core Strategy. Any shortfall in the capacity of village services and facilities required by the development will be matters which can be addressed through the normal process of developer contributions. Being no longer required for healthcare purposes, national planning policy in PPG2: Green Belts allows for redevelopment for other purposes.
22923 - Highways Agency	Object	The Highway Agency supports in principle the provision of the 'Responding to a Housing Shortfall ' document. For this site the Agency would require the Council to carry out further technical assessment before we can advise with any degree of certainty regarding the potential impact of this development proposal upon the adjacent Trunk Road Network (TRN)	Fulbourn does not adjoin the Trunk Road Network (TRN). The nearest trunk roads are the A11 and A14. The Mental Health Trusts transport evidence demonstrates that the majority of trips will be into Cambridge, avoiding the trunk road network. The development of up to 275 dwellings at Fulbourn is therefore unlikely to have an adverse effect on the trunk road network and less impact than development in remoter rural areas. Further transport investigations will be required in the form of the Traffic Impact Assessment which will accompany any planning applications.
22494	Object	I object to this proposal for such a large number of house because the bus service to Cambridge is diabolic. It takes at least an hour & half to get into Cambridge by bus in non comuter traffic how long it would take in the commuter traffic. The bus services go around the house's to get to Cambridge. The traffic in the morning and evening getting to Cambridge and back is horrendous. IT BACKS UP ALL THE WAY TO THE WINDMILL FROM THE ROBIN HOOD AT PEAK TIMES & WITH SO MANY HOUSES EXTRA, THIS WOULD MAKE IT WORSE.	Fulbourn village is served by the Citi 1 bus service which provides a 20 minute frequency of service. The timetabled journey time from Fulbourn to Cambridge city centre is 50 minutes and takes considerably longer during peak hours. However, the Council has already maximised the amount of housing development that it can allocate on the edge of Cambridge. Fulbourn is one of 3 Rural Centres close to Cambridge from which bus journeys will be shorter than most of South Cambridgeshire's villages and cycling is also a viable alternative.
22795 - East of England Development Agency	Object	EEDA has no comment to make on the above document other than we recognise the loss of the lda Darwin site to residential. In this instance we would wish to ensure that appropriate business land is secured to support the sub regional growth targets identified in the East of England Plan. Therefore we request that employment land provision is kept under periodic review to ensure an adequate supply in appropriate locations at an appropriate quality.	The Employment Land Review jointly commissioned with Cambridge City Council identified a substantial surplus of employment land in South Cambridgeshire. Against that backdrop, the Mental Health trust advised that in-patient healthcare will be relocated to the Fulbourn Hospital site and most of the remaining healthcare administrative offices on the site will find new office accommodation elsewhere in the Cambridge area.

Representations	Nature	Representation Summary	Council's Assessment
22737	Object	The site is inappropraite for housing development, would cause the loss of an essential health care facility, would add to traffic congestion, would enhance any community and is therefore an unsustainable location.	Suitability for housing: Being a Major Developed Site in the green belt, the Ida Darwin Hospital can be considered for redevelopment for uses including housing. Whilst the site lies outside the village framework of Fulbourn which is designated a Rural Centre and would not therefore normally be appropriate for housing development, it is nevertheless close to the services and facilities in the village. Redevelopment for housing brings the additional benefit of funding for the re-provision of mental healthcare facilities on the Fulbourn Hospital site.
			Loss of essential health facility: The Mental Health Trust advises that most in-patient mental health care will be transferred to new accommodation on the Fulbourn Hospital site. The remainder will be 'transferred' to 'care in the community' provision.
			Transport: The County Council as highways authority advises that the traffic that will be generated by housing development will be off-set in some measure by the loss of traffic generated by the existing uses on the Ida Darwin Hospital site.
22509	Object	I feel the Ida Darwin site is unsuitable for the level of housing currently planned. Fulbourn is currently undergoing voluminous building work and is in danger of losing it's character. As the Windmill site is currently disrupting the village I believe it would be unfair to build more houses in a village which is already losing it's identity.	Being located on the western edge of the village, development will have little impact on the overall character of the village. The Council has already maximised the amount of housing development that it can allocate on the edge of Cambridge. Fulbourn is one of 3 Rural Centres close to Cambridge from which journeys into Cambridge which is the main focus of employment will be shorter than most of South Cambridgeshire's villages and cycling is also a viable alternative. Housing development on the eastern end of the Ida Darwin Hospital site would be just over 1 kilometre from the village centre and primary school and therefore within the acknowledged limit of 2 kilometres for walking and well within cycling distance.
22768	Object	We OBJECT to using the Ida Darwin site which would be much more suitable for re-locating certain health service departments.	The Mental Health Trust advises that most in-patient mental health care will be transferred to new accommodation on the Fulbourn Hospital site. The remainder will be 'transferred' to 'care in the community' provision.
22605 - Teversham Parish Council	Object	Teversham Parish Council object to this site as it further erodes the green belt separation between the necklace villages. Transport infrastructure will be unable to cope with increased traffic. The Parish Council are also concerned about the loss of local employment should the site be redeveloped.	Green Belt: Even with the development of additional in-patient mental healthcare on the Fulbourn Hospital site and housing development adjoining Fulbourn village, an effective green belt will be maintained between Fulbourn and Cambridge by ensuring that even with the proposed re-configuration of development that overall there is no material change to the amount of development. Policy GB/4 for Major Developed Sites in the green belt does not require any change to existing green belt boundaries to allow redevelopment to go ahead.
			Transport: The County Council as highways authority advises that the traffic that will be generated by housing development will be off-set in some measure by the loss of traffic generated by the existing uses on the Ida Darwin Hospital site.
			Loss of employment: Most of the employment on the Ida Darwin site will either be transferred to the Fulbourn Hospital site or to office accommodation elsewhere in the Cambridge area.

Representations	Nature	Representation Summary	Council's Assessment
22506	Object	Object to allocation of Ida Darwin site for substantial residential use. The proposal is nothing more than an out of town estate unrelated to Fulbourn or its status as a rural centre. The site should be redeveloped for a suitable green belt use thus providing an effective green wedge between the Fulbourn Hospital site and Fulbourn village. Fulbourn should not be singled out for this scale of development on the spurious argument that it is a rural centre.	The site adjoins the village of Fulbourn and would function as an extension to the village in much the same way as a number of housing estates that have been developed around the village. Housing development at the eastern end of the Ida Darwin Hospital site will be no further distant from the village centre than many of South Cambridgeshire's larger villages. The site is part of a Major Developed Site in the green belt where national and local policy allows for development/redevelopment. The Mental Health Trust which owns and runs the site does not consider that the buildings are suitable for modern in-patient mental healthcare. Redevelopment can both provide additional housing development and an effective green wedge between the village and the Fulbourn Hospital/Capital Park complex.
22760	Object	I object strongly to your proposals - none of them makes a meaningful contribution to the problem - none of them has all the services and infrastructure needed to enable them forthwith. You are acting in 2008 on the basis of decisions taken in February 2006 - nearly three years ago in which period the world and South Cambs has moved on (or fallen apart)	Housing development on the Ida Darwin Hospital site will contribute up to 275 dwellings which is nearly one sixth of the housing shortfall. Housing development on the eastern part of the Ida Darwin Hospital site will be no further from the village centre than in many of South Cambridgeshire's larger villages and should there be any shortfall in the capacity of village services and facilities required by the development, these will be matters which can be addressed through the normal process of developer contributions. The 'credit crunch' will cause a slowdown in the rate of development but if past economic performance is a guide, the economy will recover and the need for high levels of housing development in the Cambridge area will return.
22582	Object	There is inadequate public transport to support further commuting into Cambridge - no use is made of the single track railway and the no. 1 bus in particular takes a tortuous route. Fulbourn itself already has major traffic problems - the shopping area is highly congested and traffic speeds through the village in order to avoid the traffic calming on Cambridge Road. Any primary aged children living on the development would either have to be transported right across to Fulbourn Primary or access schools within the city council area. These issues are unlikely to be adequately addressed.	Fulbourn village is served by the Citi 1 bus service which provides a 20 minute frequency of service. The timetabled journey time from Fulbourn to Cambridge city centre is 50 minutes and takes considerably longer during peak hours. However, the Council has already maximised the amount of housing development that it can allocate on the edge of Cambridge. Fulbourn is one of 3 Rural Centres close to Cambridge from which bus journeys will be shorter than most of South Cambridgeshire's villages and cycling is also a viable alternative. Housing development on the eastern end of the Ida Darwin Hospital site would be just over 1 kilometre from the village centre and primary school and therefore within the acknowledged limit of 2 kilometres for walking and well within cycling distance. Schools in Cambridge are also accessible by public transport or off-road cyclepaths.
22887 - Great Shelford Ten Acres Limited	Object	The Plan fails to meet the tests of soundness because discounting Site 27 at Tier 1 Stage is not supported by strategic policy and because the conclusion that Site 11 is suitable for development as a Major Development Site in the Green Belt is also not supported by strategic policy. Site 11 should not be identified for housing whereas Site 27 should be identified for 150 dwellings.	Being no longer required for healthcare purposes, national planning policy in PPG2: Green Belts allows for redevelopment for other purposes. Development Control Policies DPD Policy GB/4 builds on the guidance in PPG2 on previously developed sites in the Green Belt to provide for development which will have no worse impact on the Green Belt than the existing development. The Ida Darwin site adjoins Fulbourn village and is just over 1 kilometre of the village centre, ensuring that a trip to the village centre would be within the 2 kilometre distance advised in national planning policy.

Representations	Nature	Representation Summary	Council's Assessment
22928 - Cambridgeshire & Peterborough NHS Foundation Trust	Object	The Trust welcomes and supports the proposed allocation at Ida Darwin. However, it is considered that the development cannot be undertaken entirely in accordance with the provisions of Policy GB/4. Whilst the resultant footprint might be comparable with that of the existing, the floorspace and height will certainly be exceeded.	Support noted. The Examination inspectors have already received evidence that national planning policy and Development Control Policies DPD policy GB/4 provide for redevelopment which will enable the Mental Health Trust to redevelop the Ida Darwin Hospital for housing and open space, and provide new in-patient healthcare at the Fulbourn Hospital site.
		The Inspector is asked to either remove Fulbourn Hospital and Ida Darwin East from the Green Belt OR to amend proposed Policy SP/7c.	
22879 - Hutchison Whampoa Properties (Europe) Limited 22914	Object		Being no longer required for healthcare purposes, national planning policy in PPG2: Green Belts allows for redevelopment for other purposes. Development Control Policies DPD Policy GB/4 builds on the guidance in PPG2 on previously developed sites in the Green Belt to provide for development which will have no worse impact on the Green Belt than the existing development.
22907	Support	I am surprised this land hasn't already been used for housing.	Support noted.
22866	Support	Support the proposal to build houses on Ida Darwin site. The alternative proposal to build houses on the Ida Darwin site is much better. The site has a lot of unused open space and nearly all the services which use the site now are in single story buildings: most of them could be housed in 2 or 3 storey buildings, creating still more space for a new housing development.	Support noted.
22603 - Lanthorn Stile Residents Association	Support	With respect to the proposed redevelopment of site 11 (Ida Darwin) for residential housing. This under-utilised site is not part of the extensive 2020 vision for Addenbrooke's hospital healthcare and research expansion and fulfils a mainly administrative function within dilapidated buildings and infrastructure. As such it appears ideal for sensitive redevelopment.	Reasons for supporting the redevelopment are broadly consistent with the planning justification for redevelopment.
22734 - Cambridgeshire County Council	Support	The County Council supports the alternative development of this site and the opportunity it will provide to strengthen the green separation between Fulbourn and Fulbourn Hospital/the City. It may also be possible to create a new link in the green corridor running from the Roman Road towards Teversham.	Support noted. The creation of a new link in the proposed green corridor running from the Roman Road towards Teversham could only be a visual link because the railway line is still in active use.

Representations	Nature	Representation Summary	Council's Assessment
22763	Support	No objection to the use of the land for housing but the village end must be used as open space to separate the village from the new development.	Support noted. However, new housing would be better located adjoining the village to aid assimilation of the new population into the existing community, to be closest to the services and facilities in the village and to minimise the impact of redevelopment on the Green Belt.
		A considerable volume of traffic will be generated- The Cambridge Road will be overloaded in moring peaks. Destinations scattered all over the city and South Cambs.	Wherever development is located, it will add to traffic on roads which are heavily used during peak hours. Fulbourn has the advantage of 3 buses and hour and being within cycling distance of Cambridge.
		The railway level crossing on Fulbourn Old Drift must be reopened for all classes of traffic and the road improved as far as the Cherry Hinton bypass.	The re-opening of the Fulbourn Old Drift could be investigated with the highways authority and Network Rail when planning applications are being considered.
		This should be a planning consideration with the Developer paying the whole of the cost.	
22630	Support	I fully support the redevelopment of brownfield sites such as the Ida Darwin Hospital site.	Support noted.
23263 - Natural England	Support	We have no specific concerns with regard to the following Preferred Sites - 1,2,3,6,10,11 in relation to potential impacts on nationally or internationally designated sites since there are no such sites in close proximity.	Note that there are no internationally designated sites for wildlife nearby.
22912 - Cambridgeshire & Peterborough NHS Foundation Trust	Support	The Trust welcomes and supports the proposed allocation at Ida Darwin. The site is ideal for residential development, being in a sustainable location with no known constraints. In addition, it will facilitate the provision of a green area of public open space enhancing the separation of Cambridge from Fulbourn, together with the redevelopment of fit-for-purpose mental health facilities on the Fulbourn Hospital site.	Support noted.
22616 - Foxton Parish Council	Support	Proposal supported as an appropriate use of a brownfield site which is contiguous with the Fulbourn village development.	Reasons for supporting the redevelopment are broadly consistent with the planning justification for redevelopment.

Representations	Nature	Representation Summary	Council's Assessment
22707	Support	Unfortunately we have to recognise that there is a large shortfall of housing within Cambridgeshire and therefore every village is threatened with expansion. Fulbourn will need to expand in some way and as such this has to be the best site from all the areas previously identified. There is direct access to the main routes to Cambridge without further clogging up the smaller village streets. The Ida Darwin site is such a sprawling and outdated development, there must be a more suitable location for existing departments to relocate to.	Support and assessment of impact on Fulbourn noted. The Mental Health trust advises that the proposed redevelopment will enable it to co-locate all in-patient healthcare on the Fulbourn Hospital site.
22638	Support	I strongly support the use of the Ida Darwin site for housing, providing that not too many houses are crammed into the area of course.	Support noted.
Chapter 6 Davised	Annroad	ch To Chesterton Sidings	
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-	Support	The City Council support the changes to the policy approach for Chesterton Sidings, and this reflects the City Council's agreed approach to pursue an employment led development for the rest of the Northern Fringe East site, alongside the development of a railway station and interchange facility. The City Council will work with South Cambridgeshire to prepare a new planning framework for this area, as set out in paragraph 6.7 of the new supporting text to policy SP/18: Rail Infrastructure. This would be developed under the remit of the Joint Plan Making Committee (Section 29 Committee).	Support and comments noted.
6.1 22863 - Cambridge City Council	Support	The City Council support the changes to the policy approach for Chesterton Sidings, and this reflects the City Council's agreed approach to pursue an employment led development for the rest of the Northern Fringe East site, alongside the development of a railway station and interchange facility. The City Council will work with South Cambridgeshire to prepare a new planning framework for this area, as set out in paragraph 6.7 of the new supporting text to policy SP/18: Rail Infrastructure. This would be developed under the remit of the Joint Plan Making Committee (Section 29 Committee).	Support and comments noted.
6.1	Support	The City Council support the changes to the policy approach for Chesterton Sidings, and this reflects the City Council's agreed approach to pursue an employment led development for the rest of the Northern Fringe East site, alongside the development of a railway station and interchange facility. The City Council will work with South Cambridgeshire to prepare a new planning framework for this area, as set out in paragraph 6.7 of the new supporting text to policy SP/18: Rail Infrastructure. This would be developed under the remit of the Joint Plan Making Committee (Section 29 Committee).	Support and comments noted.

Representations	Nature	Representation Summary	Council's Assessment
Chapter 9 - Next Step	os .		
9.1			
23267 - Natural England	Object	Initial ecological appraisals of the Preferred Sites have identified the presence of several protected species. All proposed development sites should be subject to rigorous ecological survey and appraisal by appropriately qualified ecologists. A scheme of mitigation and enhancement in line with the UK and local Biodiversity Action Plan should be prepared and implemented.	Any new housing allocations will have to comply with other policies of the development plan, including those in the Development Control Policies DPD in relation to sustainable development, ecology (including protected species) and landscape.
		Each proposed development should have a multi-functional green infrastructure in accordance with Cambridge Green Infrastructure Strategy and S Cambs Biodiversity Strategy. A suitable landscape appraisal should also be undertaken.	
		Natural England support where developments require the preparation of a Countryside Enhancement Strategy.	
23253 - Environment Agency	Object	Any future applicant at the Preferred Sites would be required to produce appropriate site specific risk assessments, whether they be in relation to flood risk, contaminated land or groundwater protection. Appropriate mitigation measures may also be required in order for the sites to be developed. This will be in accordance with the principles of National and Local Planning Policies.	Any new housing allocations will have to comply with the requirements of other parts of the development plan, including the Development Control Policies DPD which includes polices concerning flood risk and groundwater. Contaminated land has been considered in the site assessments as part of the housing shortfall work and would be a factor that would be addressed at the planning application stage.
9.2			
22924 - Highways Agency	Object	Once the autumn 2008 public consultation is completed the Inspectors may request further information from those parties who have both supported and objected to the consultation document. The document does not include a timetable detailing when the Inspectors will meet to consider the current DPD public consultation document.	The Inspectors have made clear to the Council that there will be no further opportunity for representors to submit written material. The Council made this clear in its consultation documentation. Notwithstanding, it is possible the Inspectors may seek further clarification from specific parties if there are issues they consider they need clarity on in order to conclude their report. Whilst there was no clarity on the timetable for the rest of the process at the time of publishing the consultation documents, the Council has sought advice from the Inspectors, who have advised that they intend to hold further hearings in the second half of May, that they will provide an early part report on the NIAB site in June (probably in late June) and that they anticipate completion of their full report in July.

Representations	Nature	Representation Summary	Council's Assessment
Appendix C - Consid	leration	of the role of the Development Sequenc	e
C.3			
22526 - Eltisley Parish Council	Support	Eltisley Parish Council is upset at any further development being proposed in South Cambridgeshire. The Parish Council strongly supports South Cambridgeshire's decision to focus on sites around Cambridge because it is the best option for sustainable development especially with respect to traffic volumes.	Support noted.
22531 - Bourn Parish Council	Support	Bourn Parish Council is still concerned about the level of projected housing foisted on the region but is pleased that windfall sites are being counted as part of the allocation. That being said the Parish Council strongly supports South Cambridgeshire District Council's decision to focus on sites around Cambridge because it is the best option for sustainable development especially with respect to traffic volumes.	Support noted.

Representations	Nature	Representation Summary	Council's Assessment
C.10			
22888 - Great Shelford Ten Acres Limited	Object	The Plan fails to meet the tests of soundness because of the Council's interpretation of the assessment of the Rural Centres and in particular the ranking of Histon and Impington higher up the site search matrix than Great Shelford is not found to be robust and credible evidence base and the site search matrix does not support identification of Site11 for housing. Therefore the change sought is to place Great Shelford and Stapleford 3rd in the ranking of settlements shown at paragraph C10 and Histon and Impington should be placed 4th.	The Respondent objects to the Council 's interpretation of the assessment of the Rural Centres and challenges the resulting order of the settlements. A comparison of the relative sustainability merits of the Rural Centres was appropriate in order to inform the housing shortfall work. The Council had advised the Inspectors in Examination hearings that there is a distinction between the Rural Centres. A detailed assessment is included in the Technical Annex at Chapter 4 of the housing shortfall documents. This assessment studied the proximity of each settlement to Cambridge taking account of the cycling distance and access to High Quality Public Transport services. Also considered was the village services and facility information having regard to the presence of a village college. The assessment concluded that there is a distinction between Rural Centres having regard to location and services and facilities and also to the development strategy contained in the Core Strategy. This strategy focuses development in and on the edge of Cambridge through a number of urban extensions to the city and at the new town of Northstowe. The strategy also allows for limited development to meet local needs in Rural Centres and other villages. This strategy was confirmed in the East of England Plan published by the Government in May 2008. The Respondent disagrees with the ordering of the Rural Centres in particular that Histon and Impington should be higher up the rankings than Great Shelford. Both these settlements were identified as being close to Cambridge within reasonable cycling distance. However, Histon is closer than Great Shelford and would therefore score better on that test. In addition, Histon and Impington is served by Impington Village College, whilst Great Shelford children have to travel to Sawston village college. It is therefore appropriate that Histon and Impington is ranked above Great Shelford.

Representations 22957 - Martin Grant Homes Limited 22958 - Harcourt Developments Limited

Nature Representation Summary

Object Object to the Council's methodology in assessing the sustainability of the Rural Centres.

Cambourne is ranked as the least sustainable of the Rural Centre locations in terms of its relative accessibility by sustainable transport modes to Cambridge. It takes little account of the availability of services and facilities within Cambourne. The settlement will become more sustainable with the quantum of development proposed on the omission site north of the A428. The provision of a secondary school on this site will also help to improve Cambourne's sustainability.

Cambourne represents one of the most sustainable locations in providing for growth within the District. The Council's assessment should be amended accordingly.

Council's Assessment

The Respondent objects to the methodology used by the Council that has resulted in the Rural Centres being ranked and Cambourne being placed at the bottom of this list. A comparison of the relative sustainability merits of the Rural Centres was appropriate in order to inform the housing shortfall work.

The Council had advised the Inspectors in Examination hearings that there is a distinction between the Rural Centres. A detailed assessment is included in the Technical Annex at Chapter 4 of the housing shortfall documents. This assessment studied the proximity of each settlement to Cambridge taking account of the cycling distance and access to High Quality Public Transport services. Also considered was the village services and facility information having regard to the presence of a village college. The assessment concluded that there is a distinction between Rural Centres having regard to location and services and facilities and also to the development strategy contained in the Core Strategy. This strategy focuses development in and on the edge of Cambridge through a number of urban extensions to the city and at the new town of Northstowe. The strategy also allows for limited development to meet local needs in Rural Centres and other villages. This strategy was confirmed in the East of England Plan published by the Government in May 2008.

Cambourne when assessed alongside the other Rural Centres was found to be at the bottom of the rankings. It was included in the second grouping of settlements with Sawston. These two villages are sufficiently distant from Cambridge that all but the most determined cyclist would be discouraged from cycling, even given the provision of cycle paths. This limits the opportunity for residents to have a choice of sustainable travel choices, unlike the necklace villages where cycling is a more practical option. The public transport provision from Cambourne does not meet the High Quality Public Transport (HQPT) criteria having a 20 minute frequency. It is therefore appropriate that Cambourne is in the second group of Rural Centres. Within the second group, Sawston has HQPT and therefore performs better than Cambourne. The site assessments also concluded that there were difficulties in any of the site options at Cambourne achieving HQPT. There is currently no secondary school within Cambourne and children have to travel to Comberton Village College. This places it below Sawston that does benefit from having a village college. It is recognised that the County Council is considering the need for a secondary school at Cambourne with the currently planned development. However, the difficulties in providing HQPT and the greater distance from Cambridge suggest that Cambourne would still sit at the bottom of the Rural Centre hierarchy.

Representations	Nature	Representation Summary	Council's Assessment
Appendix D - Iden	tification o	of Site Options for Testing	
22553	Object	Reminding the Council of my 'Objection Site' at Clive Hall Drive, Longstanton which has potential for up to 3 dwellings. Site being considered by Inspectors as part of the Public Examination process for the Site Specific Policies DPD. I consider that this site, although small in size, would make a useful contribution to the housing shortfall in the rural areas of South Cambridgeshire and that there are no sound planning or other material considerations which amount to a justification for this site not coming forward for housing development.	LDF documents do not normally include allocations of land for housing for sites less than 9 dwellings. The respondent puts forward its site for 3 dwellings and it is therefore not of a scale for an allocation. Notwithstanding, the site is located at Longstanton, which is a Group village. It was therefore not included in the assessment of sites because sufficient reasonable alternatives sites had been identified by the Council in settlements higher up the hierarchy. The Council has already responded to this Objection Site and presented its case at the Examination and its position is unchanged. This is not a suitable site to address the housing shortfall.
22755	Object	Objection site no 80 / Objection ref 13173 (June 2006) Our client's site off Randalls Lane in Over is a brownfield site that is a readily available, accessible and sustainable site. Allocation of this site for development would mean there is less of a need to allocate the larger strategic sites (some of which are Greenfield and Green Belt) which are being proposed by the Council. Objection site no 101 / Objection ref 14745 (June 2006)	The respondent has requested that the Council consider his site off Randalls Lane at Over as suitable to help meet the housing shortfall. This site is an Objection Site located at Over, which is a Group Village. It was therefore not included in the assessment of sites because sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy. The Council has already responded to this Objection Site and presented its case at the Examination and its position is unchanged. This is not a suitable site to address the housing shortfall.
22742 22746 22744	Object	Our client's site off New Road in Melbourn (Objection site no 82) is a brownfield site that is a readily available, accessible and sustainable site. Allocating this site for development would mean there is less of a need to allocate the large strategic sites (some of which are Greenfield and Green Belt) which are being proposed by the Council.	The respondents have requested that the Council consider their site off New Road at Melbourn as suitable to help meet the housing shortfall. This site is an Objection Site located at Melbourn, which is a Minor Rural Centre. It was therefore not included in the assessment of sites because sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy. The Council has already responded to this Objection Site and presented its case at the Examination and its position is unchanged. This is not a suitable site to address the housing shortfall.
22675	Object	Our client's site off Middlewatch in Swavesey is a brownfield site that is a readily available, accessible and sustainable site. Allocating this site for development would mean there is less of a need to allocate the larger strategic sites (some of which are Greenfield and Green Belt) which are being proposed by the Council. Objection site no 114 / Objection ref 14714 (June 2006)	The respondent has requested that the Council consider his site off Middlewatch at Swavesey as suitable to help meet the housing shortfall. This site is an Objection Site located at Swavesey, which is a Group Village. It was therefore not included in the assessment of sites because sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy. The Council has already responded to this Objection Site and presented its case at the Examination and its position is unchanged. This is not a suitable site to address the housing shortfall.

Representations	Nature	Representation Summary	Council's Assessment
22685	Object	Our client's site off Priest Lane in Willingham is a brownfield site that is a readily available, accessible and sustainable site. Allocation this site for development would mean there is less of a need to allocate the larger strategic sites (some of which are Greenfield and Green Belt) which are being proposed by the Council. Objection site no 143 / Objection ref 14752 (June 2006)	The respondent has requested that the Council consider his site off Priest Lane at Willingham as suitable to help meet the housing shortfall. This site is an Objection Site located at Willingham, which is a Minor Rural Centre. It was therefore not included in the assessment of sites because sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy. The Council has already responded to this Objection Site and presented its case at the Examination and its position is unchanged. This is not a suitable site to address the housing shortfall.
22673	Object	Our client's site off Fen End in Over is a brownfield site that is a readily available, accessible and sustainable site. Allocating this site for development would mean there is less of a need to allocate the larger strategic sites (some of which are Greenfield and Green Belt) which are being proposed by the Council. Objection site no 98 / Objection ref 14748	The respondent has requested that the Council consider his site off Fen End at Over as suitable to help meet the housing shortfall. This site is an Objection Site located at Over, which is a Group Village. It was therefore not included in the assessment of sites because sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy. The Council has already responded to this Objection Site and presented its case at the Examination and its position is unchanged. This is not a suitable site to address the housing shortfall.
22870	Object	There may be other equally or more sustainable options within Minor Rural Centres or even Group Villages, that have not been examined in the Council's response - such as land off Greenacres, Duxford. Objection site no 21 / Objection ref 13085 (June 2006)	The respondents have requested that the Council consider their site off Greenacres in Duxford as suitable to help meet the housing shortfall. This site is an Objection Site located in Duxford, which is a Group Village. It was therefore not included in the assessment of sites because sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy. The Council has already responded to this Objection Site and presented its case at the Examination and its position is unchanged. This is not a suitable site to address the housing shortfall.
22682 22749 22751	Object	The Council's preferred locations of growth to accommodate the significant amount of housing land required does not take into account smaller brownfield sites that together could address the deficit. There are numerous sites on the edge of existing villages which are close to the major urban areas that can provide a contribution to overall housing needs. Our client's site off Dogget Lane in Fulbourn is readily available, accessible and sustainable site. Allocating this site for development would mean there is less of a need to allocate the large strategic sites (some of which are Greenfield and Green Belt) which are being proposed by the Council.	The respondents have requested that the Council consider their site off Dogget Lane at Fulbourn to help meet the housing shortfall. This site is an Objection Site located on the edge of Fulbourn, which is a Rural Centre, and comprises white land between the village framework and the Green Belt. However, it is a small site comprising 3 residential gardens and does not comprise a suitable site for new development or for a housing allocation. LDF documents do not normally include allocations of land for housing for sites less than 9 dwellings. The objections were considered at an examination hearing and the objectors' representative confirmed that they were seeking a change to the village framework and were not seeking an allocation for residential development. The Council sought written confirmation of this from the objectors' representative as part of the site assessment process and the following confirmation was received on 9 June 2008 "that we are NOT seeking a formal residential allocation on this land as I explained to the Inspectors at the Examination". For these reasons, the site was therefore not included in the assessment of sites because it does not comprise a potential site for a new housing allocation. In addition, sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy. The Council has already responded to this Objection Site and presented its case at the Examination and its position is unchanged. This is not a suitable site to address the housing shortfall.

Representations	Nature	Representation Summary	Council's Assessment
22736 - Cambridgeshire Recycling	Object	Our client's site off Potton Road in Gamlingay is a site that is a readily available, accessible and sustainable site. Including this site within the village framework would mean there is less of a need to allocate the large strategic sites (some of which are Greenfield and Green Belt) which are being proposed by the Council. Objection site no 39 / Objection ref 14713 (June 2006)	The respondents have requested that the Council consider their site off Potton Road at Gamlingay as suitable to help meet the housing shortfall. This site is an Objection Site located at Gamlingay, which is a Minor Rural Centre. It was therefore not included in the assessment of sites because sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy. The Council has already responded to this Objection Site and presented its case at the Examination and its position is unchanged. This is not a suitable site to address the housing shortfall.
22900 - Cemex UK Materials Limited	Object	We urge the Council to consider the Melbourn site (located to the south of Shepreth and to the north of the settlements of Melbourn and Meldreth, as shown on attached map) as a location for residential development, especially as it is not within the Green Belt. CEMEX believes that this site provides a suitable location to meet housing needs in rural South Cambridgeshire. The site is located in a sustainable location, near existing infrastructure and services, with access to public transport. Part of objection site no 85 / Objection ref 13897 (June 2006)	The respondent has requested that the Council consider their site located to the south of Shepreth and to the north of the settlements of Melbourn and Meldreth as suitable to help meet the housing shortfall. This site is part of a much more extensive Objection Site which extends to the north of the A10. This current site is only to the south of the A10 but still covers a large area. Melbourn and Meldreth are a Minor Rural Centre and a Group village respectively. The site was therefore not included in the assessment of sites because sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy. The Council has already responded to this Objection Site and presented its case at the Examination and its position is unchanged. The fact that this is a smaller part of the Objection Site does not change the Council's position. This is not a suitable site to address the housing shortfall.
22678 22679	Object	Our client's site off Black Horse Lane in Swavesey (Objection site no 119) is readily available, accessible and sustainable site. Allocating this site for development would mean there is less of a need to allocate the larger strategic sites (some of which are Greenfield and Green Belt) which are being proposed by the Council.	The respondents have requested that the Council consider their site off Black Horse Lane at Swavesey as suitable to help meet the housing shortfall. This site is an Objection Site located at Swavesey, which is a Group Village. It was therefore not included in the assessment of sites because sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy. The Council has already responded to this Objection Site and presented its case at the Examination and its position is unchanged. This is not a suitable site to address the housing shortfall.
22569	Object	The application for building more houses which already has an access road to it from Church Lane and Station Road in Fulbourn which keeps getting turned down would be a far more sensible proposition as it could have access to a small railway station to relieve cars on the road and save all this carbon footprints the Government keep on about. All the village shops would have more trade as its only walking distance from this site. Rethink all these sites before making any decision that would lose Fulbourn its identity as a village.	The respondent has requested that the Council consider the site north of Fulbourn to the west of Station Road as suitable to help meet the housing shortfall. This site is an Objection Site located adjacent to Fulbourn, which is a Rural Centre. However the site lies in the Green Belt and the Council did not assess any Green Belt sites at Rural Centres as there are not the exceptional circumstances required by Planning Policy Guidance note 2 for the release of land from the Green Belt at the bottom of the search sequence. It was therefore not included in the assessment of sites because sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy or that did not require the release of land from the Green Belt at Rural Centres. The Council has already responded to this Objection Site and presented its case at the Examination and its position is unchanged. This is not a suitable site to address the housing shortfall.

Representations	Nature	Representation Summary	Council's Assessment
Any Further Reasonable Alt	ernative S	Site Options?	
22753	Object	Our client's site off Town End, Duck End Girton is a brownfield site that is a readily available, accessible and sustainable site. Allocating this site for development would mean there is less of a need to allocate the larger strategic sites (some of which are Greenfield and Green Belt) which are being proposed by the Council.	The Respondent is requesting that the Council consider a site off Town End, Duck End, Girton as a potential housing site to meet the housing shortfall. This site has not been submitted for consideration at an earlier stage in the plan making process and is therefore not an Objection Site. The Council has not formally requested as part of this consultation additional sites to be put forward for consideration. Notwithstanding this the site being proposed would not be an appropriate location or site for residential development and is not a reasonable alternative for consideration through this process.
			This site is located at Girton, which is a Group Village. It was therefore not included in the assessment of sites because sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy. It is also located within the Green Belt and no exceptional circumstances have been demonstrated for its release as required by PPG2. In addition, it lies outside of the village framework and relates more to the open countryside than it does to the urban character of Girton. This is not a suitable site to address the housing shortfall.
22862 - Gallagher Waterbeach Limited	Object	Further sites at Orchard Park currently allocated for commercial uses are suitable and sustainable residential locations consistent with the East of England Plan and Core Strategy development sequence. These sites should be considered for residential uses.	The respondents have requested that the Council consider further sites at Orchard Park currently identified for commercial uses as suitable to help meet the housing shortfall. Whilst there were no duly made representations relating to land at Orchard Park, the Council tested whether there was potential for additional housing development at the site given its location at the top of the search sequence as part of its consideration of whether there were reasonable options to address the housing shortfall other than the objection sites. The 3 parcels assessed and put forward as preferred sites for public consultation were those where the COuncil was aware of proposals for residential development as alternatives to other uses, either though planning applications and appeal or through pre-application discussions. This was necessary to test whether the sites were available and deliverable. The site assessments then tested their suitability. The respondent suggests that there may be further sites at Orchard Park that are suitable for residential use as an alternative use. The representation refers to current applications for the local centre and for commercial uses and says there is an intention to implement them but flexibility is sought in case of difficulty in implementing due to economic conditions. There is no certainty that these sites would be available for residential and therefore they would not be appropriate for allocation. In addition, the local centre is a key part of the social infrastructure to support the development in the long term and its delivery is essential. The proposed policy changes would provide a context for suitable parcels to come forward for residential use whether this is consistent with a sustainable development but they are not suitable for housing allocations to address the housing shortfall.

Representations	Nature	Representation Summary	Council's Assessment
22597	Object	Land at Fulbourn - fronting onto the Teversham Road and stretches from just after the Level crossing to just inside the village sign of Fulbourn, on the right hand side as you go out of the village towards Teversham. This site is being put forward as a potential housing site for between 30-60 homes.	The Respondent is requesting that the Council consider a site off Teversham Road, Fulbourn as a potential housing site to meet the housing shortfall. This site has not been submitted for consideration at an earlier stage in the plan making process and is therefore not an Objection Site. The Council has not formally requested as part of this consultation additional sites to be put forward for consideration. Notwithstanding this the site being proposed would not be an appropriate site for residential development and is not a reasonable alternative for consideration through this process. This site is located adjacent to Fulbourn, which is a Rural Centre. However the site lies in the Green Belt and the Council did not assess any Green Belt sites at Rural Centres as there are not the exceptional circumstances required by Planning Policy Guidance note 2 for the release of land from the Green Belt at the bottom of the search sequence. It would therefore not be appropriate for assessment or allocation because sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy or that did not require the release of land from the Green Belt at Rural Centres. The site is also separated from the main body of the village by the railway line and does not relate well to it. This is not a suitable site to address the housing shortfall.
22687 22689	Object	Our client's sites off Histon Road in Cottenham are readily available, accessible and sustainable site. Including these sites within the village framework would mean there is less of a need to allocate the larger strategic sites (some of which are Greenfield and Green Belt) which are being proposed by the Council.	The respondents have requested that the Council consider their site off Histon Road at Cottenham as suitable to help meet the housing shortfall. This site was considered at the Examination as a change to the boundary of the village framework and the respondents had not previously requested an allocation for housing. Cottenham is a Minor Rural Centre. The site was therefore not included in the assessment of sites because sufficient reasonable alternative sites had been identified by the Council in settlements higher up the hierarchy. The Council has already responded to representations concerning this site and its position is unchanged. This is not a suitable site to address the housing shortfall.
22570	Object	I noticed in the enclosed leaflet that the Ida Darwin site is one of the chosen locations for housing. I actually own a site on the other side of the railway and wanted to enquire whether this could be considered in the LDF plan. The site is at the end of Fulbourn Old Drift and is the old railway crossing cottage, the crossing is now completely closed and hence the road and footpath are a dead end. The land runs parallel to the railway and is adjacent to a mobile home park, so whilst I think it is in green belt it has few of the green belt qualities I read of in the LDF plan, the backdrop when viewed when approaching Teversham is the hospital.	The Respondent is requesting that the Council consider a site at the end of Fulbourn Old Drift that includes the old railway-crossing cottage as a potential housing site to meet the housing shortfall. This site has not been submitted for consideration at an earlier stage in the plan making process and is therefore not an Objection Site. The Council has not formally requested as part of this consultation additional sites to be put forward for consideration. Notwithstanding this the site being proposed would not be an appropriate site for residential development and is not a reasonable alternative for consideration through this process. This site is located in the Green Belt adjacent to Ida Darwin part of the Major Developed Site in the Green Belt although separated from it by the railway. There are no exceptional circumstances as required by Planning Policy Guidance note 2 for the release of this site in the countryside from the Green Belt. It would therefore not be appropriate for assessment or allocation and is not a suitable site to address the housing shortfall.

Representations	Nature	Representation Summary	Council's Assessment
D.14			
22889 - Great Shelford Ten Acres Limited	Object	The Plan fails to meet the tests of soundness because of the absence of sufficient deliverable and developable supply of housing land. Due to the absence of sufficient housing land from sources within the built up area of Cambridge or on the edge of Cambridge there is a requirement to assess the potential of Green Belt land around the more sustainable Rural Centres such as Great Shelford. Site 27 at Great Shelford can be released from the Green Belt because of the need to identification of deliverable and developable housing land without damaging the purpose of the Green Belt.	The work undertaken by the Council was on the basis that there are unlikely to be exceptional circumstances for releasing land from the Green Belt if there are other suitable sites at Rural Centres on land not in the Green Belt, and that the only possible circumstance where this might arise is if there was a need to look to one of the Rural Centres that is significantly less sustainable than the others such that an assessment of potential Green Belt sites became appropriate. The result of the Council's process has been to identify sufficient sites consistent with the development sequence or other existing planning policies that there is no need to look to Green Belt land on the edge of the Rural Centres for new allocations. The objector's argument is therefore not accepted.
22694 22700 22624 22618	Object	The Council will need to allocate sites following a review of the Green Belt on the edge of at least one Rural Centre. Otherwise it will not achieve the level of completions required by the Structure Plan, and now endorsed by the RSS.	The work undertaken by the Council was on the basis that there are unlikely to be exceptional circumstances for releasing land from the Green Belt if there are other suitable sites at Rural Centres on land not in the Green Belt, and that the only possible circumstance where this might arise is if there was a need to look to one of the Rural Centres that is significantly less sustainable than the others such that an assessment of potential Green Belt sites became appropriate. The result of the Council's process has been to identify sufficient sites consistent with the development sequence or other existing planning policies that there is no need to look to Green Belt land on the edge of the Rural Centres for new allocations. The objector's argument is therefore not accepted.
D.15			
22581	Object	Great news the plans for development of 20,000 new homes in Cambs. They are badly needed and should be built the soonest possible. Why have these other sites been rejected though? (Fulbourn, Histon and Impington, Cambourne, Edge of Cambridge, Sawston and Great Shelford, Stapleford) What's wrong with them? Lets hope some more will be considered for development of more homes in the near future. Most people I happen to talk with about the housing issue are for the development of more homes in Cambs. Only the selfish ones and the irrational politicians are against.	The respondent's support for the level of new development is noted. The work undertaken by the Council was on the basis of addressing the housing requirement in a way that is consistent with the search sequence set for the Cambridge area and the principle that development should be in sustainable locations and must also be consistent with good planning principles. It is also appropriate to only go as far down the search sequence as necessary to meet the housing shortfall. Significant new development in the rural area as expansion of existing settlements is not consistent with the development strategy contained in the Core Strategy and included in the East of England Plan. The sites that have been rejected were not consistent with the strategy or had other site specific factors mitigating against them.

Representations	Nature	Representation Summary	Council's Assessment
Appendix E - Approa	ich to C	omparative Site Assessments	
22496 - Anglian Water Services Limited	Object	All potential sites should be tested within the Greater Cambridge Water Cycle Strategy for appropriateness with regard to the provision of wastewater services and capacities of wastewater treatment works.	The Council had regard to the findings of the Water Cycle Strategy Part 1 which considered water related issues in areas where major new sites were proposed or being considered and highlighted issues that would need to be addressed if development were to take place. It did not identify any fundamental problems with development in these locations. Part 2 of the Strategy is in the process of being commissioned and will include consideration of any new major development proposals through the housing shortfall process. The Environment Agency and the Council's own drainage officers were consulted during the carrying out of all the detailed site assessments and the EA and local water companies were consulted as part of the formal public consultation.
22542	Object	Priorities in order of importance - 1) No building should be carried out on any river flood plains 2) Building in empty brown sites; in cities or towns is best 3) Use of good food yielding land should, if possible, be avoided 4) Once planning permission is obtained, then the Environment Agency should carry out:- a) Dredging of nearby rivers b) Clear all ditches, drains and dykes in the area	The respondent raises a number of sound planning principles that have been taken into account in the site assessments. The Environment Agency was consulted as part of the site assessment process. They would also be consulted on any planning applications for sites allocated for residential development and detailed site specific issues, including any impact on the surrounding area, would be taken into account in determining applications.
		As everyone is aware the sites used for building do NOT allow rain to soak into that soil used for the building. The waterways locally should be prepared for extra water clearance!	

Representations Nature Representation Summary

Council's Assessment

Appendix F - Assessment of Site Options

F- Site 1: Parcel L2, Orchard Park, Cambridge Northern Fringe (West)

			F- Site 1: Parcel L2, Orchard Park, Cambridge Northern Fringe (West)
Representations	Nature	Representation Summary	Council's Assessment
22665 - Unex Holdings Limited	Object	The analysis and conclusion in respect of Site 1 and Site 2 should reflect the findings of the Secretary of State's recent appeal decision in respect of those sites. Meeting the Secretary of State's requirements in respect of affordable housing and renewable energy will mean that the development for residential uses will not be viable and the sites should be made available for commercial or mixed uses.	The respondent argues that the site is not deliverable or developable. They refer to a recent appeal decision on sites 1 and 2 (RD/SSPExam/260) which was for 182 dwellings and was dismissed on the grounds of design and because it did not meet the development plan requirements for affordable housing and provision of 10% renewable energy. The respondent argues that the level of development assumed in the housing shortfall work would not be viable (100 dwellings). They say the SOS decision now imposes greater costs on the development to meet the policy targets in full. They say the SOS considered the density of the proposal to be acceptable although they recognise that the design was not accepted. They point to the requirements on the new parcels are higher than on the approved 900 units on Orchard Park and that the sites will therefore not come forward while there are sites that can be delivered at lower cost. They conclude that the appeal decision prevents viable development of the site.
			The Council notes that the appeal decision confirms that residential use on the sites is acceptable in principle, that the objective of providing a sustainable mixed use development would not be compromised, and that it would provide housing in a sustainable location consistent with regional and Core Strategy policies as the housing would be in a preferred location for development. It concludes that the proposal would be an efficient use of land and provide much needed housing in a sustainable location. It also concludes that the provision and range of employment land would not be materially affected. The appeal also confirms the proposal provides sufficient open space (through contributions) and adequate car parking provision. It confirms that the site would not be subject to unacceptable noise levels from existing noise sources and that it would provide a satisfactory environment in terms of air quality and would provide a safe environment for its inhabitants. It also confirms that there would not be a material adverse impact on the highway

The Council notes the respondent's concerns relating to potential viability of these sites for residential development. However, the principle that residential use would be appropriate has been established and viability is an extremely sensitive calculation that depends to a significant extent on the assumptions built into financial modeling, the overall package of obligations and market conditions at the time of negotiations. In particular, a scheme which optimizes the chances of securing affordable housing grant would have a material impact on overall viability. Whilst the Council cannot give a guarantee to the respondent that a viable scheme can be granted planning permission, the Council does not accept on the basis of one particular scheme considered through the appeal process, that it can be concluded that a viable scheme will not be able to be permitted and developed by 2016. Viability is a relevant planning consideration, subject to the achievement of a scheme that is acceptable in planning terms. The affordable housing policy (Development Control Polices DPD, Policy HG/3) specifically states that viability will be taken into account in determining planning applications. The number of dwellings assumed for the housing shortfall work is not a ceiling on any scheme and it is possible that a suitable scheme in design terms could come forward that achieves a higher number of units whist still meeting other policy requirements. However, the 100 dwellings over the 2 sites is considered a robust figure to use for the housing shortfall purposes. It is accepted that this is not clear in the proposed new wording for the

network in the am and pm peaks. The appeal identified specific problems with the development in terms of its design and in terms of affordable housing provision and renewable energy provision. In particular, the SOS commented that the appellant had made no efforts to optimize the chances of the scheme attracting grant and the conscious decision not to rely on Social Housing Grant has had

consequences for the overall viability of the proposal.

F- Site 1: Parcel L2, Orchard Park, Cambridge Northern Fringe (West)

Representations	Nature Representation Summary	Council's Assessment
		supporting text and a change is proposed. The argument about these parcels being more expensive than the remainder of the Orchard Park development is not relevant in housing land supply terms, because the Council is assuming that the existing approved residential development will be completed by 2012/13. Even if there is some slippage on that timetable because of market conditions, it is reasonable to assume that the additional sites could be developed by 2016.
		ACTION
		Amend the 3rd sentence of proposed paragraph 2.3 to read:
		"These known parcels could provide in the order of 220 additional dwellings, although the final number will be determined through detailed planning applications, and could be higher, although regard must be had to the constraints on these parcels."

F- Site 2: Parcel Com 4, Orchard Park, Cambridge Northern Fringe (West)

Representations Nature Representation Summary Council's Assessment

F- Site 2: Parcel Com 4, Orchard Park, Cambridge Northern Fringe (West)

			F- Site 2: Parcel Com 4, Orchard Park, Cambridge N
Representations	Nature	Representation Summary	Council's Assessment
22666 - Unex Holdings Limited	Object	The analysis and conclusion in respect of Site 1 and Site 2 should reflect the findings of the Secretary of State's recent appeal decision in respect of those sites. Meeting the Secretary of State's requirements in respect of affordable housing and renewable energy will mean that the development for residential uses will not be viable and the sites should be made available for commercial or mixed uses.	The respondent argues that the site is not deliverable or developable. They refer decision on sites 1 and 2 (RD/SSPExam/260) which was for 182 dwellings and the grounds of design and because it did not meet the development plan require affordable housing and provision of 10% renewable energy. The respondent are of development assumed in the housing shortfall work would not be viable (100 say the SOS decision now imposes greater costs on the development to meet the full. They say the SOS considered the density of the proposal to be acceptable recognise that the design was not accepted. They point to the requirements on higher than on the approved 900 units on Orchard Park and that the sites will the forward while there are sites that can be delivered at lower cost. They conclude decision prevents viable development of the site.
			The Council notes that the appeal decision confirms that residential use on the sin principle, that the objective of providing a sustainable mixed use development compromised, and that it would provide housing in a sustainable location consist and Core Strategy policies as the housing would be in a preferred location for deconcludes that the proposal would be an efficient use of land and provide much a sustainable location. It also concludes that the provision and range of employ be materially affected. The appeal also confirms the proposal provides sufficien (through contributions) and adequate car parking provision. It confirms that the subject to unacceptable noise levels from existing noise sources and that it wou

efer to a recent appeal d was dismissed on irements for argues that the level 00 dwellings). They the policy targets in le although they on the new parcels are therefore not come de that the appeal

e sites is acceptable ent would not be sistent with regional development. It ch needed housing in ovment land would not ent open space ne site would not be subject to unacceptable noise levels from existing noise sources and that it would provide a satisfactory environment in terms of air quality and would provide a safe environment for its inhabitants. It also confirms that there would not be a material adverse impact on the highway network in the am and pm peaks. The appeal identified specific problems with the development in terms of its design and in terms of affordable housing provision and renewable energy provision. In particular, the SOS commented that the appellant had made no efforts to optimize the chances of the scheme attracting grant and the conscious decision not to rely on Social Housing Grant has had consequences for the overall viability of the proposal.

The Council notes the respondent's concerns relating to potential viability of these sites for residential development. However, the principle that residential use would be appropriate has been established and viability is an extremely sensitive calculation that depends to a significant extent on the assumptions built into financial modeling, the overall package of obligations and market conditions at the time of negotiations. In particular, a scheme which optimizes the chances of securing affordable housing grant would have a material impact on overall viability. Whilst the Council cannot give a guarantee to the respondent that a viable scheme can be granted planning permission, the Council does not accept on the basis of one particular scheme considered through the appeal process, that it can be concluded that a viable scheme will not be able to be permitted and developed by 2016. Viability is a relevant planning consideration, subject to the achievement of a scheme that is acceptable in planning terms. The affordable housing policy (Development Control Polices DPD, Policy HG/3) specifically states that viability will be taken into account in determining planning applications. The number of dwellings assumed for the housing shortfall work is not a ceiling on any scheme and it is possible that a suitable scheme in design terms could come forward that achieves a higher number of units whist still meeting other policy requirements. However, the 100 dwellings over the 2 sites is considered a robust figure to use for the housing shortfall purposes. It is accepted that this is not clear in the proposed new wording for the

Representations	Nature	Representation Summary	Council's Assessment
			supporting text and a change is proposed. The argument about these parcels being more expensive than the remainder of the Orchard Park development is not relevant in housing land supply terms, because the Council is assuming that the existing approved residential development will be completed by 2012/13. Even if there is some slippage on that timetable because of market conditions, it is reasonable to assume that the additional sites could be developed by 2016.
			ACTION
			Amend the 3rd sentence of proposed paragraph 2.3 to read:
			"These known parcels could provide in the order of 220 additional dwellings, although the final number will be determined through detailed planning applications, and could be higher, although regard must be had to the constraints on these parcels."
F- Site 5: Land between Hui	ntingdon 1	Road, Histon Road and the A14, North West Camb	oridge (Objection Site)
22858 - Cambridge Preservation Society	Object	The Society strongly objects to piecemeal development proposals and ad-hoc erosion of the Green Belt to the edge of Cambridge. It is considered that site 6 together with the NIAB site (already under development) and site 5 (a 'rejected site') are considered together in view of removing areas from the Green Belt and that an encompassing master plan with ample green space provisions from small pocket parks to country park-scale as well as recreational link to the countryside to the NE of the A14 should be created. Fragmenting the area by permitting solely site 6 to be developed for a Travellers site and housing development would prevent a coherent approach in the medium and long-term in this whole area (between A14 and Milton/Huntingdon Road) and thus creating a poorly sustainable urban extension.	The Council has rejected the objectors boundary (site 5) as not being a suitable site for development and as a result of that consideration has proposed a modified boundary (site 6) that it considers is more appropriate, particularly in following boundaries on the ground where possible and providing adequate separation with Histon and Impington. This modified boundary is considered appropriate to propose as a new site allocation in the specific context of a housing shortfall having regard to the search sequence contained in the Core Strategy. The proposed policy requires that the site is well integrated with the adjoining allocation in Cambridge City and this issue was considered as part of the examination hearings. Joint working has been in progress for a number of years between the District, City and County Councils and the developers for the NIAB sites in both South Cambs and the City and also with Cambridge University which is proposing a further new urban extension to the south of Huntingdon Road to ensure that this quadrant of the city is planned as a whole.
23221 - RLW Estates	Support	Support rejection of alternative sites on edge of Cambridge because release of further Green Belt sites would erode setting of Cambridge. This contrary to the sequential approach in LDF. Greenfield development should be confined to strategic Green Belt releases specified. Site 5 plays key role in defining character of urban area and performs an important role in separating Cambridge and	Support and comments noted.
		surrounding villages. The role of this land in relation to Green Belt objectives is of greater importance given the allocation of adjoining land for development. Development of entire site would be subject to constraint due to its location adjacent to the A14.	

Representations	Nature	Representation Summary	Council's Assessment
22716 - Cambridge City Council	Support	Cambridge City Council support the rejection of this site. The release of Green Belt land in this location would be detrimental to the purposes of the Cambridge Green Belt, particularly the separation of Girton from Cambridge. The City Council is also concerned in relation to any adverse transport, air quality and noise impacts on the City that may arise from the proposed development.	Support and comments noted.
F- Site 6: Land between Hu	ıntingdon .	Road, Histon Road and the A14, North West Camb	ridge (Council's Revised Site Boundary)
22956 - Barratt Strategic	Object	The Sustainability Appraisals for site 5 and for site 6 were compared. The SA for site 6 states that the revised site significantly reduces the potential for poor air quality to impact on health. However having a narrow strip of land approximately parallel to the A14 will not make a fundemental difference to the sustainability objective. Both site 5 and site 6 should have the same score. Since sites 1-3 are within the AQMA it is evident that this does not preclude development.	The sustainability appraisal has been prepared by independent consultants who identified a difference between sites 5 and 6. This view is consistent with the view of the Council in the context of considering new allocations for development close to the AQMA. The distinction between this site and the Orchard Park sites, is that the Orchard Park sites would be alternative uses for parcels within a development that was proposed and received planning permission before the AQMA was designated and therefore would have minimal net impact on the AQMA, unlike a new allocation at NIAB.

F- Site 7: Land North of Barton Road

23222 - RLW Estates

Support

Support rejection of alternative sites on the edge of Cambridge because release of further Green Belt sites would erode the setting of Cambridge. Would be contrary to sequential approach in the LDF. Greenfield development should be confined to the strategic Green Belt releases specified.

Site 7 plays an important role in protecting Cambridge's form as a compact city. In accordance with PPG2 the Green Belt should be maintained.

The site is poorly related to existing urban area of Cambridge and has poor access to high quality public transport. Its development would diminish the openness and degree of separation between Cambridge and Barton.

Support and comments noted.

Representations	Nature	Representation Summary	Council's Assessment
22720 - Cambridge City Council	Support	Cambridge City Council support the rejection of this site. The site is in the GreenBelt and not in a location identified in the Structure Plan for release. Development here would have a detrimental impact on views of the City. The site is also constrained due to risk of flooding and lack of adequate accessibility by public transport. The adjoining site within Cambridge City, was the subject of a legal challenge to the adoption of the Cambridge Local Plan but the High Court and Court of Appeal found in favour of the City Council for these reasons.	Support and comments noted.
F- Site 8: Land north of Fe	n Road, M	Ailton (Greengates Piggeries)	
22771	Object	Suggest this as an alternative site.	The Council's site assessment concluded that this site is not suitable for a housing allocation for various reasons, including the location of a significant part of the front of the site in Flood Zone 2, the rural character of the area and the separation from the urban area of Cambridge caused by the railway line and concerns arising about intensification of development in this location.
22662 - Cambridge City Council Property & Building Services	Object	The City Council, as owner of this site, previously put forward representations that this site is suitable for residential development and objects to the rejection of this site. This representation is made by the City Council's Property Department, as freehold owner of the site. The site is in a sustainable location at the edge of Cambridge. There would be opportunities for a coordinated housing development with the adjacent allocated housing site in Cambridge City Council area. A 2005 City Council study considered this site not suitable as a	The Council's site assessment concluded that this site is not suitable for a housing allocation for various reasons, including the location of a significant part of the front of the site in Flood Zone 2, the rural character of the area and the separation from the urban area of Cambridge caused by the railway line and concerns arising about intensification of development in this location.
		gypsy and traveller site.	
23219 - RLW Estates	Support	We support South Cambridgeshire District Council's rejection of the alternative sites on the edge of Cambridge. We object to these sites on the basis that release of further Green Belt sites, on top of those already released, would erode the setting of Cambridge as a compact, historic city. Furthermore this would be contrary to the sequential approach that the LDF is pursuing in line with the Structure Plan and RSS14, which is now carried forward by the Core Strategy. Having given priority to previously developed land opportunities, greenfield development should be confined to the strategic Green Belt releases specified.	Support and comments noted.

Representations	Nature	Representation Summary	Council's Assessment		
F- Site 9: Land south of Ma	- Site 9: Land south of Manor Park / Somerset Road, Histon				
22891 - Great Shelford Ten Acres Limited	Object	Objecting to fact that Site 9 - Manor Park in Histon was included in the comparative site assessment although is is not an objection site and it is not clear whether this site is deliverable.	The Council's approach to the housing shortfall work was to test whether the objection sites comprised all reasonable alternatives that should be tested and subject to sustainability appraisal. This site was included as an area of white land on the edge of a Rural Centre. It is also subject to representations by the landowner to the Submission DPD seeking the inclusion of the land within the village framework to allow potential uses to come forward. It is therefore a sound approach to test its suitability for housing development. Having considered the site in detail, the assessment concluded that it is not a good option for development and it has been rejected.		
22999 - Impington Parish Council	Support	Histon Parish Council made detailed proposals to show that this land should be used as open space land to partly mitigate the substantial shortfall of open space within the villages of Histon and Impington. The District Council would have to identify adequate suitable alternatives for the present level of housing as well as any increase proposed. The Parish Council therefore supports the District Council view that this area would not be suitable to be brought forward for housing for this reason as well as those detailed by the District Council.	Support and comments noted.		
22651	Support	As an Impington resident I object to all new housing development in this area. The reason is sustainability. The now well evidenced catastrophe unfolding in our planets ecosystem is apparently still not taken seriously by our government or local planners, who are encouraging the building of more roads, more airport runways and more houses. WE ALL KNOW what the result will be. Is there any limit to damage to be done to our quality of life? Answer is resounding 'No'. Are we going to stop environmental destruction before a runaway greenhouse effect takes hold? Tragically the	Support and comments noted.		
20724 Citton Dovich Court	C	answer to this will also be 'No'	Company and all		
22731 - Girton Parish Council	Support	Local need for open spaces	Support noted.		

Representations	Nature	Representation Summary	Council's Assessment
23227 - RLW Estates	Support	We support South Cambridgeshire District Council's rejection of the alternative sites at Histon and Impington. Although the allocation of small sites at this Rural Centre could potentially be consistent with the Core Strategy DPD reliance on such sites, even to a relatively small degree, would support the dispersal of growth towards the rural areas, which are inherently less sustainable than other options in the hierarchy. Were other sites at the top of the search sequence rejected through this process it would be unacceptable and unsustainable to rely on these sites to meet the growing shortfall.	Support and comments noted.
22988 - Histon Parish Council	Support	Histon Parish Council made detailed proposals to show that this land should be used as open space land to partly mitigate the substantial shortfall of open space within the villages of Histon and Impington. The District Council would have to identify adequate suitable alternatives for the present level of housing as well as any increase proposed. HIston Parish Council therefore supports the District Council view that this area would not be suitable to be brought forward for housing for this reason as well as those detailed by the District Council.	Support and comments noted.
23004 - RSPB	Support	The RSPB supports the conclusion of Site Assessment in respect of Site 9: land South of Manor Park / Somerset Road, namely, that the site does not represent a good option for development. The RSPB welcomes the retention of the site for open space, as well as the recognition of the potential biodiversity value of the land. The RSPB recommends that the open space requirement be met with provision of 'green space'. This would not only be in keeping with the character of the site but would provide multiple benefits, including opportunities for recreation and education as well as biodiversity.	Support and comments noted.

F- Site 9: Land south of Manor Park / Somerset Road, Histon

Representations	Nature	Representation Summary	Council's Assessment
22650	.,	As an Impington resident I object to all new housing development in this area. The quality of life in the village has deteriorated. There is a permanent roar of traffic from the A14 reflected off the wall at Arbury Park and into the village. The noise and pollution level will get worse with changes to A14. The new park and ride site has created traffic speeding through the village. The county's roads are permanently on the edge of gridlock with major traffic jams an almost daily occurrence. To add any more houses and cars to this situation is madness	Comments noted.

Representations	Nature	Representation Summary	Council's Assessment			
F- Site 11: Ida Darwin Hos	F- Site 11: Ida Darwin Hospital, Fulbourn					
22951 - Barratt Strategic Object	Object	No assessment has been made on the extent that the site supports the purpose of the Green Belt or the visual impact	The contribution that the site makes to the Green Belt has been considered in the Landscape Design Associates "Cambridge Green Belt Study" 2002 in which they conclude:			
		of densification on that part of the site proposed for development.	"Supportive townscape/landscape' which it describes as "areas of townscape/landscape which support the character of the historic core and areas distinctive to the city. They provide the backdrop and ambience, and bolster the sense of place of the city and its approaches" (Drawing no. 1641LP/08 opposite page 66 and Drawing No. 1641LP/09 opposite page 75).			
			The study includes a detailed appraisal of the east of the city which begins at page 88. Fulbourn Hospital is described on page 92 as:			
			"a good example of Victorian Hospital architecture in a parkland setting"			
			Together with the windmill on Fulbourn Road it described as s 'landmark' in this eastern sector of the Green Belt, see also drawing 1641LP/13 opposite page 101).			
			Fulbourn Hospital occupies the parkland grounds of the former Victoria asylum and is described more fully on page 94 as providing a			
			"limited degree of green separation between the built up settlements of Fulbourn and Cambridge" albeit that the hospital developments are "not strongly rural in character".			
			This is recognised in the Major Developed Sites designation of the Hospitals complex.			
			Landscape Design Associates conclusion on the future of the Green Belt in this area is that			
			"The gap between Fulbourn and Cambridge should not be allowed to become more 'urban' in character as this would damage the setting and special character of the city by destroying the separate identity of Fulbourn".			
			Finally the vision for East Cambridge set out in section 7.5 proposes that			
			"The separate identity of Fulbourn should be safeguarded by ensuring that treatment of the former hospital sites between Fulbourn and Cherry Hinton is predominantly rural and undeveloped in character".			
			Being no longer required for healthcare purposes, national planning policy in PPG2 "Green Belts" allows for redevelopment for other purposes. Development Control Policies DPD policy GB/4 builds on the guidance in PPG2 on previously developed sites in the Green Belt to provide for development which will have no worse impact on the Green Belt than the existing development.			

Representations	Nature	Representation Summary	Council's Assessment		
22878 - Hutchison Whampoa Properties (Europe) Limited	Object	Summary of Sustainability Appraisal for site 11 includes a number of recommendations that if this location is to go forward for further consideration will need to be considered. Includes noise issues; ensure development is sympathetic to Conservation Area and ensure groundwater recharge is not affected.	The issues raised in the Sustainability Appraisal of the site are addressed in the Council's proposed policy and supporting text, having regard also to the fact that the DPD must be read alongside of relevant DPDs including the Development Control Policies DPD. The SA goes on to appraise the proposed policy and recommends that no changes are necessary.		
F- Site 12: Land between T	F- Site 12: Land between Teversham Road and Cow Lane, Fulbourn				
22772	Object	Suggest this as an alternative site.	The Council's detailed site assessment concluded that this site is not suitable for an housing allocation.		

Representations Nature Representation Summary Council's Assessment 22874 - Hutchison Whampoa Object Land between Teversham Road and Cow Lane, Fulbourn As part of the site assessment process, the respondent provided additional technical information Properties (Europe) Limited comprises a delilverable and sustainable housing allocation relating to flood risk and drainage, noise and ecology (Reference Documents RD/Resp/110, 111, within the plan period which will not necessitate the release 112 and 113). of Green Belt land. There are no barriers to development which cannot be overcome as part of the detailed The site assessment identified concerns about the impact of development on the eastern part of the Masterplanning of the site. Evidence has already been site on the appearance of the area due to openness to the north. However, there are drainage submitted to the Inspector which overcomes any concerns issues relating to this site that have not been satisfactorily resolved. As set out in the site in relation to noise, groundwater and impact on the assessment the Environment Agency has advised on the basis of latest information submitted by Conservation Area. the respondent as part of the housing shortfall work that they recommend the site not be allocated because of concerns that site specific investigations have not been undertaken and there is no evidence to demonstrate that a satisfactory solution to high groundwater levels in this area can be found for both any new properties on the site and also existing properties in the surrounding area. The western part of the site is more enclosed, however serious environmental constraints have been identified in respect of noise and odour. Whilst the respondent has provided a noise

assessment, the Council's Environment Health officers do not consider that this provides an adequate assessment that meet government requirements set out in PPG24: Planning and Noise. There are industrial units to the north west of the site that have been identified by both parties as the dominant ambient noise source, and an appropriate assessment of their impact is necessary to assess the suitability of this site for housing in respect of noise, although the impact of other employment uses to the east of the site and the railway line also need further assessment. The general plant noise from the joinery and coachworks businesses dominate the ambient noise throughout the site. Other discrete noises occur intermittently such as the screech of a wood cutting machine. The noise levels increase when a compressor type unit operates for several minutes every 5 to 10 minutes.

The site is clearly dominated by industrial noise, which is generally recognized as been more disturbing than transport noise. PPG 24 recommends the use of BS 4142: 1990 "Method for rating industrial noise affecting mixed residential and industrial areas" as the best available assessment standard in the circumstances. The noise report prepared by the respondent does not undertake an acceptable BS 4142 assessment, as there has been no actual assessment of the rating noise attributable to the industrial units and the increase over background noise levels when these businesses are not operating. The Council's Environmental Health officers have carried out an informal assessment to gauge an indication of the impact of the industrial premises to inform this process. It does not comprise a full BS 4142 assessment and should not be treated as such, but it indicates that the site is subject to an increase in noise levels over background noise in the middle of the site of the order of 15dB. This increases to around 25 dB (A) near the site boundary. This would indicate that very serious noise disturbance would be likely. It should be noted that an increase of 10dB is typically observed by the average person as a doubling in subjective noise levels.

BS 4142 only offers an indication of the likelihood of noise complaints from residential. It offers no test of acceptability in allocating housing sites but the assessment indicates that, in general, compared with background noise levels (rating level):

- a difference of 10dB or more indicates that complaints are likely

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- a difference of 5dB is likely to be of marginal significance

PPG24 refers to noise from industrial and commercial developments and refers to BS 4142 rating levels. It does not directly link these to the NEC noise categories. However, the Council considers that a reasonable interpretation would be to compare a 10dB increase in noise with NEC D where "Planning permission should normally be refused" and a 5dB increase with NEC C where "Planning permission should not normally be granted. Where it is considered that permission should be given, for example because there are no alternative quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise". On this basis it can be seen that this site is one where noise is so significant that planning permission should not normally be granted.

The respondent's report states that noise levels across the entire site can be secured through the imposition of suitable planning conditions, requiring noise mitigation measures. Environmental Health officers have advised that noise mitigation measures by conditions could be considered and are theoretically possible but that it cannot be certain if any or a combination of these can reduce both internal and external noise levels to an acceptable level in view of the high ambient noise levels. This is complicated by the noise source being outside the site and not in the control of the respondent.

Issues have also been identified in respect of odour from the industrial premises to the north west of the site. One business is engaged in the manufacture and installation of bespoke joinery and has a spray finish facility on site. The coachworks undertake vehicle bodywork and has a repair and a spray booth with ventilation stacks that discharge to the rear adjacent to this site. Both of these businesses have the potential to generate solvent type smells / odours associated with aerosol paint spraying or similar and neither requires permission under and Pollution Prevention Control Regulation. Environmental Health officers have visited the site and at that time a strong solvent type smell was clearly detectable with a zone 15 to 20 metres from the site boundary to the industrial units at Breckenwood Road. They have advised that if residential premises were present in this area a statutory odour nuisance is likely to be caused. Odour that is generated off site cannot be mitigated by any works on the proposed development site so again this affects the respondent's ability to mitigate the problem and no evidence has been provided to demonstrate a satisfactory solution.

Due to the significant questions outstanding over the suitability of the site for development and the potential for appropriate mitigation measures in technical terms as well as the other planning considerations in relation to this site, the Council considers that it is not a suitable site for allocation to address the housing shortfall.

Representations	Nature	Representation Summary	Council's Assessment
22865	Support	Object to use of land west of Station Road Fulbourn for building houses.	Support and comments noted.
		I am writing to object to a proposal to use agricultural land for the building of houses. It would take away a vital part of the green ring or green belt which runs round almost the whole of the village and is its most attractive feature. I do not believe that it would significantly help the Fulbourn shops, businesses or community since the northern relief road which is the only valuable part of the proposal, would make it easier for traffic from Station Road and the Wilbrahams to avoid Fulbourn and travel directly to Cherry Hinton.	
23228 - RLW Estates	Support	We support South Cambridgeshire District Council's rejection of the alternative sites at Fulbourn. Although the allocation of small sites at this Rural Centre could potentially be consistent with the Core Strategy DPD reliance on such sites, even to a relatively small degree, would support the dispersal of growth towards the rural areas, which are inherently less sustainable than other options in the hierarchy.	Support and comments noted.
		Were other sites at the top of the search sequence rejected through this process it would be unacceptable and unsustainable to rely on these sites to meet the growing shortfall.	
F- Site 13: Land West of Co	ambourne		
22644	Object	The WEST of CAMPOLIDNE site is well worth exploring for	The housing shortfall work identified sufficient new sites to address the housing shortfall higher up

The WEST of CAMBOURNE site is well worth exploring for 22644 Object its position adjacent to the two major access points to the A428. CAXTON JIBBET & CAMBOURNE. Although it cannot be an extension of CAMBOURNE, it being designated as a rural settlement, it could be a very useful settlement in its own right and fill some of the needs of the local area, such as the much needed secondary school, some small local shops that can't compete with

MORRISONS, but would be supported by a local community and may even, in the future, fill the wish to turn CAMBOURNE into a market town, at present its infrastructure hardly warrants that of some villages.

The housing shortfall work identified sufficient new sites to address the housing shortfall higher up the search sequence within or on the edge of Cambridge or on sites that involve redevelopment of previously developed sites where this is consistent with other policies. Cambourne as a Rural Centre lies at the bottom of the search sequence and the shortfall work concluded it is the least sustainable of the Rural Centres. There is no need to allocate greenfield land for a major expansion of Cambourne which would not be consistent with the urban focused development strategy set out in the Core Strategy and endorsed by the East of England Plan, which makes clear that development on the edge of Rural Centres would be mainly limited to existing commitments. The development of Cambourne is too far advanced to change direction and create a small new town, particularly in terms of enhancing the centre sufficiently to provide the higher order services and facilities that would be required for Cambourne to function as a town. Notwithstanding, the Council acknowledges that of the Cambourne expansion options, this site relates better to the existing form of Cambourne subject to addressing the infrastructure challenges and an objection from the County Council on archaeological grounds.

Representations	Nature	Representation Summary	Council's Assessment
22527 - Eltisley Parish Council	Support	Eltisley Parish Council welcomes South Cambridgeshire District Council's rejection of all the sites around Cambourne because there is a lack of infrastructure in the area. There should be no future development in the Cambourne area before improvements in infrastructure, particularly during the remainder of the A428.	Support and comments noted.
23235 - RLW Estates	Support	We support the rejection of the alternative sites at Cambourne on the basis that further development at Cambourne would be inherently unsustainable and in any event represents a scale of growth that should be considered in the context of the RSS Review. Cambourne is the least sustainable of the Rural Centres identified in the Core Strategy. The allocation of further housing development at Cambourne would therefore form a version of a dispersal strategy for which there is no provision in the Core Strategy or strategic planning policy. Site 13 would result in an unbalanced settlement, skewed towards the existing settlement of Caxton to the south, diminishing the degree of separation with this village. Such development would be inconsistent with the longestablished masterplan principles for Cambourne.	Support and comments noted.
22532 - Bourn Parish Council	Support	The Parish Council welcomes South Cambridgeshire District Council's rejection of all the sites around Cambourne because it will allow time for this community to evolve gradually rather than continually disrupted with speculative development proposals.	Support and comments noted.
22783	Support	I don't support any of the sites around Cambourne being built, including Bourn Airfield, unless there are more facilities in Cambourne, such as more shops and a police station. Morrisons is already very full at some times of day, and I would support an expansion of that shop. Also, Morrisons petrol station is not worth queuing up at sometimes because the queues can be so long. Finally, if more people came to live here, the A428 would start to feel like the A14 in terms of amount of traffic. We came to live here partly because the lighter traffic meant it was easier to get into Cambridge for work.	Support and comments noted.

Representations	Nature	Representation Summary	Council's Assessment
22797 - Swavesey Internal Drainage Board	Support	The Board, like the Environment Agency (EA), is most concerned about the increased volume of treated effluent discharging from Uttons Drove sewage treatment works into the Swavesey Drain system which will have a detrimental affect on the surrounding land drainage/flood defence systems and will contribute to increased flooding in the Board's area unless a more appropriate point of discharge is found.	Support and comments noted.
		Confirmation will be required that surface water disposal from this site will be to Bourn Brook and not into Swavesey Drain.	
		The site may be outside the floodplain shown on the EA Flood Map and the South Cambridgeshire District Council SFRA but the downstream receiving watercourses are within the floodplain. The site may also be susceptible to surface water flooding.	
		The Great Ouse CFMP would apply here.	
22598	Support	I support the rejection of further development in or close to Cambourne. Roads are already congested. Further development will cause traffic chaos and completely change the character of the area. It would also breach the promise residents were sold i.e. of three seperate villages not a huge town. There is enough development already planned - agreed and underway eg St Neots and Northstowe to provide for the future. Infrastructure eg schools already struggle to cope. The proposed development will make matters worse. It is an unnecessary development.	Support and comments noted.

Representations	Nature	Representation Summary	Council's Assessment
F- Site 14: Land North of A	1428, Cam	bourne	
22762	Object	The only place that has all services available - a highway built and the promise of a secondary school and special bus service - is north of A428, north of Cambourne - it could provide near immediate housing - why not use it? Its surface water frains off to the Ely Ouse not more to the Cam.	The housing shortfall work identified sufficient new sites to address the housing shortfall higher up the search sequence within or on the edge of Cambridge or on sites that involve redevelopment of previously developed sites where this is consistent with other policies. Cambourne as a Rural Centre lies at the bottom of the search sequence and the shortfall work concluded it is the least sustainable of the Rural Centres. There is no need to allocate greenfield land for a major expansion of Cambourne which would not be consistent with the urban focused development strategy set out in the Core Strategy and endorsed by the East of England Plan, which makes clear that development on the edge of Rural Centres would be mainly limited to existing commitments. The development of Cambourne is too far advanced to change direction and create a small new town, particularly in terms of enhancing the centre sufficiently to provide the higher order services and facilities that would be required for Cambourne to function as a town. Furthermore, this site does not relate well to the existing village and there would be significant adverse impacts on landscape and biodiversity. Development north of the A428 would in effect be a separate, further new settlement which would simply be located adjacent to Cambourne.
22961 - Martin Grant Homes Limited 22962 - Harcourt Developments Limited	Object	We propose land north of the A428 at Cambourne as an alternative and additional housing allocation to come forward during the plan period. Such an allocation would help make the Site Specific Policies DPD sound and would provide a deliverable alternative to those sites currently proposed for housing development. The DPD should be amended to include land north of Cambourne as a housing allocation for a total of 2,500 dwellings, with up to around 1,500 expected to be delivered during the plan period to 2016. The first completions could be in 2011/2012.	The housing shortfall work identified sufficient new sites to address the housing shortfall higher up the search sequence within or on the edge of Cambridge or on sites that involve redevelopment of previously developed sites where this is consistent with other policies. Cambourne as a Rural Centre lies at the bottom of the search sequence and the shortfall work concluded it is the least sustainable of the Rural Centres. There is no need to allocate greenfield land for a major expansion of Cambourne which would not be consistent with the urban focused development strategy set out in the Core Strategy and endorsed by the East of England Plan, which makes clear that development on the edge of Rural Centres would be mainly limited to existing commitments. The development of Cambourne is too far advanced to change direction and create a small new town, particularly in terms of enhancing the centre sufficiently to provide the higher order services and facilities that would be required for Cambourne to function as a town. Furthermore, this site does not relate well to the existing village and there would be significant adverse impacts on landscape and biodiversity. Development north of the A428 would in effect be a separate, further new settlement which would simply be located adjacent to Cambourne.
23234 - RLW Estates	Support	We support the rejection of the alternative sites at Cambourne because further development at Cambourne would be unsustainable and represents a scale of growth that should be considered in the RSS Review. Cambourne is the least sustainable of the Rural Centres. The allocation of further housing development at Cambourne would form a version of a dispersal strategy for which there is no provision in the Core Strategy. Site 14 would be out of scale with the existing new settlement, and would create a separate settlement due to the A428. Such a development would be inconsistent with the Cambourne masterplan principles.	Support and comments noted.

Representations	Nature	Representation Summary	Council's Assessment
23003 - RSPB	Support	The RSPB supports the Council's decision in respect of Site 14, to not support development of the site on the grounds of inter alia biodiversity, sustainability and potential off-site impacts of increased surface water run-off.	Support and comments noted.
		The RSPB notes that the site could not provide sufficient access to sustainable modes of transport should development be granted. The RSPB therefore agrees that development of this area fails to meet the test of soundness of justification of the plan, as reasonable alternatives, which would not result in detrimental impacts to the biodiversity interest and to the facilitation of sustainable living, clearly exist.	
22798 - Swavesey Internal Drainage Board	Support	The Board, like the Environment Agency (EA), is most concerned about the increased volume of treated effluent discharging from Uttons Drove sewage treatment works into the Swavesey Drain system which will have a detrimental affect on the surrounding land drainage/flood defence systems and will contribute to increased flooding in the Board's area unless a more appropriate point of discharge is found.	Support and comments noted.
		Confirmation will be required that surface water disposal from this site will be to Bourn Brook and not into Swavesey Drain.	
		The site may be outside the floodplain shown on the EA Flood Map and the South Cambridgeshire District Council SFRA but the downstream receiving watercourses are within the floodplain. The site may also be susceptible to surface water flooding.	
		The Great Ouse CFMP would apply here.	
22641	Support	The rejected sites, north of the A428 (two sites) and BOURN AIRFIELD (two sites), would have detrimental effect on villages in the BOURN VALLEY.	Support and comment noted.
		There would be no control over traffic attempting to enter/exiting the M11 junction at BARTON.	
		This extra traffic, together with the increase caused by the expansion of COMBERTON COLLEGE, would make for an unacceptable safety situation.	

Representations	Nature	Representation Summary	Council's Assessment
22784	Support	I don't support any of the sites around Cambourne being built, including Bourn Airfield, unless there are more facilities in Cambourne, such as more shops and a police station. Morrisons is already very full at some times of day, and I would support an expansion of that shop. Also, Morrisons petrol station is not worth queuing up at sometimes because the queues can be so long. Finally, if more people came to live here, the A428 would start to feel like the A14 in terms of amount of traffic. We came to live here partly because the lighter traffic meant it was easier to get into Cambridge for work.	Support and comments noted.
22533 - Bourn Parish Council	Support	The Parish Council welcomes South Cambridgeshire District Council's rejection of all the sites around Cambourne because it will allow time for this community to evolve gradually rather than continually disrupted with speculative development proposals.	Support noted.
22599	Support	I support the rejection of further development in or close to Cambourne. Roads are already congested. Further development will cause traffic chaos and completely change the character of the area. It would also breach the promise residents were sold i.e. of three seperate villages - not a huge town. There is enough development already planned - agreed and underway eg St Neots and Northstowe to provide for the future. Infrastructure eg schools already struggle to cope. The proposed development will make matters worse. It is an unnecessary development.	Support and comments noted.
22528 - Eltisley Parish Council	Support	Eltisley Parish Council welcomes South Cambridgeshire District Council's rejection of all the sites around Cambourne because there is a lack of infrastructure in the area. There should be no future development in the Cambourne area before improvements in infrastructure, particularly during the remainder of the A428.	Support and comments noted.

Representations	Nature	Representation Summary	Council's Assessment
F- Site 15: Bourn Airfield (1), Cambo	purne	
22814 - Countryside Properties (Special Projects) Limited	Object	The Council do not seem to have fully comprehended the relatively detailed development proposals that have been submitted by Andrew Martin Associates in relation to Bourn Airfield. We do not feel that there are any insurmountable constraints to delivery on this site. Given the need for additional sites to be identified, we submit that Bourn Airfield should be allocated so that it can contribute towards housing requirements within and beyond the Plan period. Detailed representations have also been submitted on: sustainability, transport, planning history, ecology, landscape, archaeology, drainage, air quality, noise, education and The Broadway. We submit that the inclusion of Bourn Airfield as an allocation can contribute to the housing supply within the Plan period, increasing the likelihood of housing requirements being met.	The housing shortfall work identified sufficient new sites to address the housing shortfall higher up the search sequence within or on the edge of Cambridge or on sites that involve redevelopment of previously developed sites where this is consistent with other policies. Cambourne as a Rural Centre lies at the bottom of the search sequence and the shortfall work concluded it is the least sustainable of the Rural Centres. There is no need to allocate greenfield land for a major expansion of Cambourne which would not be consistent with the urban focused development strategy set out in the Core Strategy and endorsed by the East of England Plan, which makes clear that development on the edge of Rural Centres would be mainly limited to existing commitments. By comparison with sites higher up the search sequence, development at Bourn Airfield would not contribute to the achievement of sustainable development (section 39 of the Planning and Compulsory Purchase Act 2004). The development of Cambourne is too far advanced to change direction and create a small new town, particularly in terms of enhancing the centre sufficiently to provide the higher order services and facilities that would be required for Cambourne to function as a town. The strategic scale and location of development proposed would not fundamentally change the character and vision of Cambourne, it would simply make it larger but still substantially less sustainable than development on the edge of Cambridge or in a new town planned from the outset on the principles of current best practice. There are also concerns about the impact of a new centre nearby on the existing Cambourne village centre. Furthermore, Bourn Airfield does not relate well to the form of Cambourne and would not provide a logical or sustainable extension to the village. It would be perceived visually and functionally as a separate new settlement. The objector's representations do not overcome these principled and site specific concerns.
22534 - Bourn Parish Council	Support	The Parish Council welcomes South Cambridgeshire District Council's rejection of all the sites around Cambourne because it will allow time for this community to evolve gradually rather than continually disrupted with speculative development proposals.	Support noted.
22600	Support	I support the rejection of further development in or close to Cambourne. Roads are already congested. Further development will cause traffic chaos and completely change the character of the area. It would also breach the promise residents were sold i.e. of three seperate villages not a huge town. There is enough development already planned - agreed and underway eg St Neots and Northstowe to provide for the future. Infrastructure eg schools already struggle to cope. The proposed development will make matters worse. It is an unnecessary development.	Support and comments noted.

Representations	Nature	Representation Summary	Council's Assessment
22785	Support	I don't support any of the sites around Cambourne being built, including Bourn Airfield, unless there are more facilities in Cambourne, such as more shops and a police station. Morrisons is already very full at some times of day, and I would support an expansion of that shop. Also, Morrisons petrol station is not worth queuing up at sometimes because the queues can be so long. Finally, if more people came to live here, the A428 would start to feel like the A14 in terms of amount of traffic. We came to live here partly because the lighter traffic meant it was easier to get into Cambridge for work.	Support and comments noted.
22799 - Swavesey Internal Drainage Board	Support	The Board, like the Environment Agency (EA), is most concerned about the increased volume of treated effluent discharging from Uttons Drove sewage treatment works into the Swavesey Drain system which will have a detrimental affect on the surrounding land drainage/flood defence systems and will contribute to increased flooding in the Board's area unless a more appropriate point of discharge is found. Confirmation will be required that surface water disposal from this site will be to Bourn Brook and not into Swavesey Drain. The site may be outside the floodplain shown on the EA Flood Map and the South Cambridgeshire District Council SFRA but the downstream receiving watercourses are within the floodplain. The site may also be susceptible to surface water flooding.	Support and comments noted.
		The Great Ouse CFMP would apply here.	
22529 - Eltisley Parish Council	Support	Eltisley Parish Council welcomes South Cambridgeshire District Council's rejection of all the sites around Cambourne because there is a lack of infrastructure in the area. There should be no future development in the Cambourne area before improvements in infrastructure, particularly during the remainder of the A428.	Support noted.

Representations	Nature	Representation Summary	Council's Assessment
23236 - RLW Estates	Support	We support the rejection of the alternative sites at Cambourne on the basis that further development at Cambourne would be inherently unsustainable and in any event represents a scale of growth that should be considered in the context of the RSS Review. Cambourne is the least sustainable of the Rural Centres	Support and comments noted.
		identified in the Core Strategy. The allocation of further housing development at Cambourne would therefore form a version of a dispersal strategy for which there is no provision in the Core Strategy or strategic planning policy.	
		Proposed expansion of Cambourne on the site of Bourn Airfield (site 15) would produce an unbalanced settlement that would threaten coalescence with the village of Highfields to the east. The site contains a County Wildlife Site, providing a further constraint to development.	
22642	Support	The rejected sites, north of the A428 (two sites) and BOURN AIRFIELD (two sites), would have detrimental effect on villages in the BOURN VALLEY.	Support and comments noted.
		There would be no control over traffic attempting to enter/exiting the M11 junction at BARTON.	
		This extra traffic, together with the increase caused by the expansion of COMBERTON COLLEGE, would make for an unacceptable safety situation.	

Representations	Nature	Representation Summary	Council's Assessment
F- Site 16: Bourn Airfield (2), Cambo	purne	
22815 - Countryside Properties (Special Projects) Limited	Object	The Council do not seem to have fully comprehended the relatively detailed development proposals that have been submitted by Andrew Martin Associates in relation to Bourn Airfield. We do not feel that there are any insurmountable constraints to delivery on this site. Given the need for additional sites to be identified, we submit that Bourn Airfield should be allocated so that it can contribute towards housing requirements within and beyond the Plan period. Detailed representations have also been submitted on: sustainability, transport, planning history, ecology, landscape, archaeology, drainage, air quality, noise, education and The Broadway. We submit that the inclusion of Bourn Airfield as an allocation can contribute to the housing supply within the Plan period, increasing the likelihood of housing requirements being met.	The housing shortfall work identified sufficient new sites to address the housing shortfall higher up the search sequence within or on the edge of Cambridge or on sites that involve redevelopment of previously developed sites where this is consistent with other policies. Cambourne as a Rural Centre lies at the bottom of the search sequence and the shortfall work concluded it is the least sustainable of the Rural Centres. There is no need to allocate greenfield land for a major expansion of Cambourne which would not be consistent with the urban focused development strategy set out in the Core Strategy and endorsed by the East of England Plan, which makes clear that development on the edge of Rural Centres would be mainly limited to existing commitments. By comparison with sites higher up the search sequence, development at Bourn Airfield would not contribute to the achievement of sustainable development (section 39 of the Planning and Compulsory Purchase Act 2004). The development of Cambourne is too far advanced to change direction and create a small new town, particularly in terms of enhancing the centre sufficiently to provide the higher order services and facilities that would be required for Cambourne to function as a town. The strategic scale and location of development proposed would not fundamentally change the character and vision of Cambourne, it would simply make it larger but still substantially less sustainable than development on the edge of Cambridge or in a new town planned from the outset on the principles of current best practice. There are also concerns about the impact of a new centre nearby on the existing Cambourne village centre. Furthermore, Bourn Airfield does not relate well to the form of Cambourne and would not provide a logical or sustainable extension to the village. It would be perceived visually and functionally as a separate new settlement. The objector's representations do not overcome these principled and site specific concerns.
22536 - Bourn Parish Council	Support	The Parish Council welcomes South Cambridgeshire District Council's rejection of all the sites around Cambourne because it will allow time for this community to evolve gradually rather than continually disrupted with speculative development proposals.	Support noted.
22601	Support	I support the rejection of further development in or close to Cambourne. Roads are already congested. Further development will cause traffic chaos and completely change the character of the area. It would also breach the promise residents were sold i.e. of three seperate villages not a huge town. There is enough development already planned - agreed and underway eg St Neots and Northstowe to provide for the future. Infrastructure eg schools already struggle to cope. The proposed development will make matters worse. It is an unnecessary development.	Support and noted.

Representations	Nature	Representation Summary	Council's Assessment
22643	Support	The rejected sites, north of the A428 (two sites) and BOURN AIRFIELD (two sites), would have detrimental effect on villages in the BOURN VALLEY.	Support and comments noted.
		There would be no control over traffic attempting to enter/exiting the M11 junction at BARTON.	
		This extra traffic, together with the increase caused by the expansion of COMBERTON COLLEGE, would make for an unacceptable safety situation.	
22786	Support	I don't support any of the sites around Cambourne being built, including Bourn Airfield, unless there are more facilities in Cambourne, such as more shops and a police station. Morrisons is already very full at some times of day, and I would support an expansion of that shop. Also, Morrisons petrol station is not worth queuing up at sometimes because the queues can be so long. Finally, if more people came to live here, the A428 would start to feel like the A14 in terms of amount of traffic. We came to live here partly because the lighter traffic meant it was easier to get into Cambridge for work.	Support and comments noted.
23237 - RLW Estates	Support	We support the rejection of the alternative sites at Cambourne on the basis that further development at Cambourne would be inherently unsustainable and in any event represents a scale of growth that should be considered in the context of the RSS Review.	Support and comments noted.
		Cambourne is the least sustainable of the Rural Centres identified in the Core Strategy. The allocation of further housing development at Cambourne would therefore form a version of a dispersal strategy for which there is no provision in the Core Strategy or strategic planning policy.	
		Proposed expansion of Cambourne on the site of Bourn Airfield (site 16) would produce an unbalanced settlement that would threaten coalescence with the village of Highfields to the east.	
22530 - Eltisley Parish Council	Support	Eltisley Parish Council welcomes South Cambridgeshire District Council's rejection of all the sites around Cambourne because there is a lack of infrastructure in the area. There should be no future development in the Cambourne area before improvements in infrastructure, particularly during the remainder of the A428.	Support noted.

Representations	Nature	Representation Summary	Council's Assessment
22796 - Swavesey Internal Drainage Board	Support	The Board, like the Environment Agency (EA), is most concerned about the increased volume of treated effluent discharging from Uttons Drove sewage treatment works into the Swavesey Drain system which will have a detrimental affect on the surrounding land drainage/flood defence systems and will contribute to increased flooding in the Board's area unless a more appropriate point of discharge is found. Confirmation will be required that surface water disposal from this site will be to Bourn Brook and not into Swavesey	Support and comments noted.
		Drain. The site may be outside the floodplain shown on the EA Flood Map and the South Cambridgeshire District Council SFRA but the downstream receiving watercourses are within the floodplain. The site may also be susceptible to surface water flooding.	
		The Great Ouse CFMP would apply here.	
F.6			
22507	Support	Pleased to see the good decision on sites appropriately reject.	Support noted.

Representations	Nature	Representation Summary	Council's Assessment
Appendix G - Draft P	olicies	for the new Housing Allocations	
G.1			
22890 - Great Shelford Ten Acres Limited	Object	Objecting to the Council's Draft Policies for new housing allocations. Sites 1,2, 3 and 11 should be omitted and an appropriately worded policy for the delivery of residential development at site 27 by 2016 should be included.	**********Reworded response needed********************************
23268 - Natural England	Support	Natural England welcomes those policies which require developers to implement multi-functional Sustainable Drainage Systems within the Preferred Sites, providing amenity, landscape, biodiversity and recreation benefits as well as surface water drainage.	Support noted.
POLICY SP/1 Cambridge No	orthern F	Fringe West (Orchard Park)	
22882 - Countryside Properties (Special Projects) Limited	Object	This proposal to provide an additional 220 units on an already constrained and densely planned site results in the loss of non-residential uses, compromising the sustainability credentials of the development as it was originally planned.	It is not accepted that the capacities assumed for these sites are too high. The capacities assumed for the purposes of the housing shortfall work is deliberately conservative to ensure a robust approach. The actual numbers would be a matter of determination through a planning application and having regard to the context of the site.
		Whilst it may be possible for many contributions to be made in terms of commuted sums, the ability to provide additional open space on the Orchard Park site, given the significant increase in numbers of units proposed, is questioned.	

Representations Nature Representation Summary Council's Assessment

Supporting text to SP/1 - 2.2

Representations

Nature Representation Summary

development.

Object

Council's Assessment

22670 - Unex Holdings Limited

Changes should be made to paragraphs 2.2 and 2.3 to reflect the outcome of the recent appeal on the sites number APP/W0530/A/08/2062801 that was dismissed on the grounds of design and insufficient contributions for affordable housing and renewable energy. This decision imposes requirements on the development of the site that make the development solely for residential uses unviable. The change in wording proposed will allow the sites to be put to a viable use for commercial or mixed use

The Council notes that the appeal decision confirms that residential use on the sites is acceptable in principle, that the objective of providing a sustainable mixed use development would not be compromised, and that it would provide housing in a sustainable location consistent with regional and Core Strategy policies as the housing would be in a preferred location for development. It concludes that the proposal would be an efficient use of land and provide much needed housing in a sustainable location. It also concludes that the provision and range of employment land would not be materially affected. The appeal also confirms the proposal provides sufficient open space (through contributions) and adequate car parking provision. It confirms that the site would not be subject to unacceptable noise levels from existing noise sources and that it would provide a satisfactory environment in terms of air quality and would provide a safe environment for its inhabitants. It also confirms that there would not be a material adverse impact on the highway network in the am and pm peaks. The appeal identified specific problems with the development in terms of its design and in terms of affordable housing provision and renewable energy provision. In particular, the SOS commented that the appellant had made no efforts to optimize the chances of the scheme attracting grant and the conscious decision not to rely on Social Housing Grant has had consequences for the overall viability of the proposal. The Council notes the respondent's concerns relating to potential viability of these sites for residential development. However, the principle that residential use would be appropriate has been established and viability is an extremely sensitive calculation that depends to a significant extent on the assumptions built into financial modeling, the overall package of obligations and market conditions at the time of negotiations. In particular, a scheme which optimizes the chances of securing affordable housing grant would have a material impact on overall viability. Whilst the Council cannot give a guarantee to the respondent that a viable scheme can be granted planning permission, the Council does not accept on the basis of one particular scheme considered through the appeal process, that it can be concluded that a viable scheme will not be able to be permitted and developed by 2016. Viability is a relevant planning consideration, subject to the achievement of a scheme that is acceptable in planning terms. The affordable housing policy (Development Control Polices DPD, Policy HG/3) specifically states that viability will be taken into account in determining planning applications. The number of dwellings assumed for the housing shortfall work is not a ceiling on any scheme and it is possible that a suitable scheme in design terms could come forward that achieves a higher number of units whist still meeting other policy requirements. However, the 100 dwellings over the 2 sites is considered a robust figure to use for the housing shortfall purposes. It is accepted that this is not clear in the proposed new wording for the supporting text and a change is proposed. The argument about these parcels being more expensive than the remainder of the Orchard Park development is not relevant in housing land supply terms, because the Council is assuming that the existing approved residential development will be completed by 2012/13. Even if there is some slippage on that timetable because of market conditions, it is reasonable to assume that the additional sites could be developed by 2016.

ACTION

Amend the 3rd sentence of proposed paragraph 2.3 to read: "These known parcels could provide in the order of 220 additional dwellings, although the final number will be determined through detailed planning applications, and could be higher, although regard must be had to the constraints on these parcels."

Supporting text to SP/1 - 2.3

Representations Nature Representation Summary Council's Assessment

Supporting text to SP/1 - 2.3

Representations

Nature Representation Summary

Object

Council's Assessment

22671 - Unex Holdings Limited

Changes should be made to paragraphs 2.2 and 2.3 to reflect the outcome of the recent appeal on the sites number APP/W0530/A/08/2062801 that was dismissed on the grounds of design and insufficient contributions for affordable housing and renewable energy. This decision imposes requirements on the development of the site that make the development solely for residential uses unviable. The change in wording proposed will allow the sites to be put to a viable use for commercial or mixed use development.

The Council notes that the appeal decision confirms that residential use on the sites is acceptable in principle, that the objective of providing a sustainable mixed use development would not be compromised, and that it would provide housing in a sustainable location consistent with regional and Core Strategy policies as the housing would be in a preferred location for development. It concludes that the proposal would be an efficient use of land and provide much needed housing in a sustainable location. It also concludes that the provision and range of employment land would not be materially affected. The appeal also confirms the proposal provides sufficient open space (through contributions) and adequate car parking provision. It confirms that the site would not be subject to unacceptable noise levels from existing noise sources and that it would provide a satisfactory environment in terms of air quality and would provide a safe environment for its inhabitants. It also confirms that there would not be a material adverse impact on the highway network in the am and pm peaks. The appeal identified specific problems with the development in terms of its design and in terms of affordable housing provision and renewable energy provision. In particular, the SOS commented that the appellant had made no efforts to optimize the chances of the scheme attracting grant and the conscious decision not to rely on Social Housing Grant has had consequences for the overall viability of the proposal. The Council notes the respondent's concerns relating to potential viability of these sites for residential development. However, the principle that residential use would be appropriate has been established and viability is an extremely sensitive calculation that depends to a significant extent on the assumptions built into financial modeling, the overall package of obligations and market conditions at the time of negotiations. In particular, a scheme which optimizes the chances of securing affordable housing grant would have a material impact on overall viability. Whilst the Council cannot give a guarantee to the respondent that a viable scheme can be granted planning permission, the Council does not accept on the basis of one particular scheme considered through the appeal process, that it can be concluded that a viable scheme will not be able to be permitted and developed by 2016. Viability is a relevant planning consideration, subject to the achievement of a scheme that is acceptable in planning terms. The affordable housing policy (Development Control Polices DPD, Policy HG/3) specifically states that viability will be taken into account in determining planning applications. The number of dwellings assumed for the housing shortfall work is not a ceiling on any scheme and it is possible that a suitable scheme in design terms could come forward that achieves a higher number of units whist still meeting other policy requirements. However, the 100 dwellings over the 2 sites is considered a robust figure to use for the housing shortfall purposes. It is accepted that this is not clear in the proposed new wording for the supporting text and a change is proposed. The argument about these parcels being more expensive than the remainder of the Orchard Park development is not relevant in housing land supply terms, because the Council is assuming that the existing approved residential development will be completed by 2012/13. Even if there is some slippage on that timetable because of market conditions, it is reasonable to assume that the additional sites could be developed by 2016.

ACTION

Amend the 3rd sentence of proposed paragraph 2.3 to read: "These known parcels could provide in the order of 220 additional dwellings, although the final number will be determined through detailed planning applications, and could be higher, although regard must be had to the constraints on these parcels."

Representations	Nature	Representation Summary	Council's Assessment
Supporting text to SP/1 - 2	5		
22861 - Gallagher Waterbeach Limited	Object	Seek an acknowledgement within the supporting text to Policy SP/1 to recognise (probably in paragraph 2.5) that whilst the commercial use of the two remaining commercial parcels adjacent to the A14 parcels is to be pursued there is the possibility that such uses may not be viable. In such circumstances these parcels could be used for residential use to meet any housing shortfall.	The proposed changes to the wording of Policy SP/1 to facilitate residential development as a change from the approved masterplan is not specific on the location or number of parcels that this may apply to, but is clear that this can only come forward if it is compatible with the overall Orchard Park development, for example does not involve the loss of community facilities. It would potentially provide for additional parcels other than those identified in the proposed paragraph 2.3, which are clearly said to be included in the principle and identified as the currently "known" sites. As there is no certainty that any further sites will come forward or that they would be suitable for residential use, it would not be appropriate to rely on any further sites to count towards the housing shortfall. Any further sites that may come forward would be considered on their merits against the policy. There is no need for any change to the proposed policy or supporting text.
POLICY SP/1a North West	Cambridg	ge Huntingdon Road to Histon Road	
22937 - Martin Grant Homes Limited 22939 - Harcourt Developments Limited	Object	We object to the Council's assessment of delivery. There is no certainty that the improvement works to the A14 will be completed in order to allow for a material amount of completions from this site within the plan period to 2016. The DPD should be based upon a degree of certainty. There is insufficient certainty with this site in order to justify making an allowance for the delivery of up to 810 dwellings within the period to 2016. We are of the view that the site is likely to deliver at best a maximum of up to 270 dwellings within the plan period to 2016. Consequential amendments should also be made to the proposed policy in Appendix G.	The issue of delivery has been addressed in response to separate representations by these respondents. The Highways Agency has provided confirmation of its intended programme for completion of the necessary section of the A14 improvements that supports the capacity of the site to 2016 as 630 dwellings.
22884 - Countryside Properties (Special Projects) Limited	Object	1) This site performs an important Green Belt function as development would compromise Green Belt purposes and coalescence would be created between Girton and the City. In 2007 the Council argued this Green Belt was important and now the Council has changed its mind and we do not believe that there are very special circumstances to justify the release of this important Green Belt land. 2) The timing of the improvements to the A14 creates two scenarios resulting in a considerable range of dwelling numbers from 270 to 810 on this site. Phasing details of the A14 works are not available until early 2010. 3) Delivery rates of 350 dwelling per annum are very unlikely and 200 dpa would be more realistic.	The Council has addressed the points raised in this objection in response to separate representations. The Highways Agency has provided confirmation of its intended programme for completion of the necessary section of the A14 improvements that supports the capacity of the site to 2016 as 630 dwellings.
22981 - Barratt Strategic	Object	To replace the policy wording for site 6 with that contained at Appendix B or if this approach does not find favour with the Inspectors, to amend the policy wording for the site in accordance with the suggested amendments in the Statement.	The Council has already advised the Inspectors that it does not agree the respondents proposed policy wording which is not sufficiently detailed to provide an adequate policy context for a major development of this nature. The respondents comments on the COuncil's proposed policy are addressed under separate representations.

Representations	Nature	Representation Summary	Council's Assessment
23000 - RSPB	Object	The RSPB welcomes the recognition of the biodiversity value of greenfield land in policy SP/1a, and requirements for developers to implement a Biodiversity Management Strategy for the site should development be granted.	The suggestion to include reference to carbon emissions reduction is agreed although it is considered this is best in the supporting text at para a.13 by adding a new second sentence: "Use of sustainable transport modes will help reduce carbon emissions of the development and help mitigate the effects on climate change".
		The RSPB is supportive of proposals to link the site to surrounding areas through sustainable transport. However, we recommend the carbon emissions reduction rationale for this provision is highlighted, to promote climate change awareness.	The suggestion regarding open space is also agreed. A new sentence is proposed to the end of paragraph a.12: "Open space provision will also provide opportunities for enhanced nature conservation value, and will enable quiet enjoyment of the natural environment."
		The RSPB further recommends that it be made explicit within the policy that open space will also be considered as areas of nature conservation value, which enable quiet enjoyment of the natural environment	
POLICY SP/1a - 1			
22963 - Barratt Strategic	Object	Revisions suggested to Policy SP/1a in light of the revised site boundary.	The respondent proposes a change to the site area in the policy to reflect the larger site it is promoting. The COUncil has explained why it does not support the larger site in response to separate representations.
POLICY SP/1a - 2			
22964 - Barratt Strategic	Object	Revised wording to Policy SP/1a. The amended wording would mean that a Masterplan would be submitted with the first planning application and not have to be approved	The principle of the change sought is agreed. Revised wording is proposed that reflects the wording of the adopted Cambridge East Area Action Plan for consistency.
		before the first application.	ACTION
			Revise section 2 of the policy to read:
			"2. A Spatial Masterplan will be submitted for approval by the Local Planning Authorities as part of the first application for planning permission to demonstrate that the development will integrate effectively with development in Cambridge City:"
POLICY SP/1a - 3			
22965 - Barratt Strategic	Object	Questioning why a single paragraph deals with a variety of issues - social cohesion, urban design and landscaping.	The comment is noted. The aim is to reduce the number of sections of the policy where possible in recognition of the length and complexity of the policy, which in effect is seeking to perform the function of an Area Action Plan.

Representations	Nature	Representation Summary	Council's Assessment
POLICY SP/1a - 4			
22966 - Barratt Strategic	Object	This paragraph lacks clarity in terms of precisely what any planning application would be required to provide and therefore considered unacceptable.	The proposed wording sought to provide a clear statement of intent that would be given effect through negotiations on a planning application. This also has the benefit of providing flexibility. The respondent has sought greater clarity of the policy requirement and suggests reference to reference to the Code for Sustainable Homes. Such an approach is proposed for the NW Cambridge Area Action Plan. However, that policy is supported by technical evidence having regard to the specific circumstances of that development as required by the Climate Change Supplement to Planning Policy Statement 1. In the absence of such evidence for this site, the Council does not feel able to propose specific targets. However, the objective would be to at least be consistent with the Code for Sustainable Homes targets and if possible ahead of them as has proved to be an appropriate policy approach for NW Cambridge AAP.
POLICY SP/1a - 5			
22967 - Barratt Strategic	Object	Clearly there is a requirement to meet the various Code levels for specific elements of any scheme at the relevant point in time. Why has water conservation been singled out from the Code for Sustainable Homes? The requirements of the Code for Sustainable Homes at relevant points in time should be the benchmark to be used.	The aim was to achieve consistency with the NW Cambridge AAP for this issue where possible. It is considered appropriate for water conservation issues where compliance with the Code is sought. However, the AAP seeks that development to be a step ahead of the Code for Sustainable Homes for energy which is supported by a technical evidence base which is not available for this site at this late stage in the plan making process.

POLICY SP/1a North West Cambridge Huntingdon Road to Histon Road, POLICY SP/1a - 6

Representations	Nature Representation Summary	Council's Assessment

POLICY SP/1a - 6

was genuinely major, and to fail to make necessary provision because of the effect this would have

Representations	Nature	Representation Summary	Council's Assessment
22968 - Barratt Strategic	Object	Object In paragraph 6 of the policy the number of dwelllings must be revised in light of the revised boundary proposed for the site. An additional sentence to para 6 is unexpected. The issue of Gypsy and Traveller pitches being required to be accomodated on the site is an entirely new one not considered before. The objector had been advised that the Council were dealing with this issue through an entirely separate DPD. Not correct or appropriate for this document to pre-empt the conclusions of this new DPD. Disappointing that the issue has not been raised before.	The respondent is correct that the issue of Gypsy and Traveller provision has not been raised previously through the DPD process. This is in part because the Council has previously been of the view that this site should not be allocated for development and the detail of any policy requirements of an allocation had not been considered in detail. It is also correct that the Council is preparing a separate Gypsy and Travellers DPD and the Area Action Plans for the other major developments have referred to a potential need for provision for Gypsies and Travellers being identified through that plan. As a result of the public consultation on Issues and Options in 2006, the Council decided that its preferred approach for inclusion in the DPD was that the provision of Gypsy and Traveller pitches will be considered at all major new developments. It should therefore not be a surprise that the Council would seek provision at the NIAB site. This approach is consistent with current government policy and emerging regional policy and reflects the increasing emphasis on incorporating provision for Gypsies and Travellers into mainstream planning. PPS3 paragraph 24 requires that strategic sites have regard to the needs of specific groups, and reflect the profile of households requiring housing. Government good practice guidance 'Designing Gypsy and Traveller Sites' states that, 'Where possible, sites should be developed near to housing for the settled community as part of mainstream residential developments.'
			GO-East wrote to local Councils on 3 December 2008 on the importance of meeting the accommodation needs of Gypsies and Travellers (RD/SSPExam/230). They say there is already a strong interim policy framework in the shape of Policy H3 of the approved East of England Plan and Circular 1/06 providing a robust basis for determining planning applications and go on to say that there is a pressing need for DPDs containing site allocations for Gypsies and Travellers. They say that local authorities should consider the potential benefits that might be available through the incorporation of Gypsy and Traveller site proposals within wider site provision DPDs rather than being developed as stand alone DPDs and that this could deliver a framework more rapidly to assist the delivery of Gypsy and Traveller sites. They say it would be consistent with the policy emphasis on mainstreaming Gypsy and Traveller accommodation provision within general housing needs as well as helping to focus attention on the potential to deliver Gypsy and Traveller site provision as part of the S106 negotiation on major sites.
			The East of England Plan Single Issue Review for Gypsies and Travellers proposes a replacement to Policy H3 which sets specific targets for provision and states that local authorities should seek to secure provision as soon as possible through the development control process particularly when opportunities present themselves in respect of new major developments and through the preparation of Local Development Documents. The Panel Report of the Examination in Public (18 December 2008, RD/SSPExam/240) includes a section on provision through major developments (starting at paragraph 7.26). The Panel considers that there are locational advantages in linking some new site provision with major developments. This will help to mainstream Gypsy and Travellers site provision, seeing it as part of the affordable housing element of new residential and mixed developments. The report states that in so far as some Gypsies and Travellers have a preference for some detachment and rural locations, the Panel does not agree that this precludes suitably designed provision as part of major developments. There would be little impact on density of development achieved if a development was genuinely major, and to fail to make percessary provision because of the effect this would have

Representations	Nature	Representation Summary	Council's Assessment
			on density would be perverse and contrary to the overall aims of policy in relation to meeting the housing need of all households. The Panel considers that it would be helpful for CLG to take any opportunities that arise to encourage developers to consider including Gypsy and Traveller accommodation as part of their affordable housing offer particularly in major new developments.
			For all these reasons, the Council has taken a positive approach to specifically propose the inclusion of provision for Gypsy and Travellers as part of the affordable housing allocation at NIAB. This is entirely consistent with current and recently emerging national and regional advice. It is considered that appropriate provision for Gypsies and Travellers could be provided at the NIAB site through the masterplanning process.
POLICY SP/1a - 7			
22969 - Barratt Strategic	Object	As Gypsy and Traveller site provision is part of the affordable housing provision then it should be referred to in section 7 and not section 6. Gypsy and Traveller site provision is one form of affordable housing provision and should not be singled out for different treatment from other forms of provision	Part 6 of the policy refers to the needs to address all sectors of society and refers to provision of affordable housing. The reference to the requirement for Gypsy and Traveller provision as part of the affordable housing provision is relevant to both those issues and therefore is appropriately addressed in this section of the policy. Part 7 of the policy relates to the target for affordable housing provision.
POLICY SP/1a - 9			
22982 - Barratt Strategic	Object	Attached is a final draft Position Statement which has been the subject of discussion with the Highway Agency and Cambridgeshire County Council. Comments made by all parties have been incorporated into the final draft and agreement is therefore expected imminently.	The position statement is noted. It does not require any change to the policy which remains the appropriate requirement of any development on this site.

Representations	Nature	Representation Summary	Council's Assessment
POLICY SP/1a - 16			
22970 - Barratt Strategic	Object	Paragraph 16 makes reference to countryside beyond the Objector's site. The Objector understands that the extent of public access being sought is the utilisation of the bridge currently used by NIAB over the A14 to enable pedestrians and cyclists to travel north over the A14 and out to the villages of Histon, Impington and Girton. Such access would only be deliverable in the form of limited, clearly marked and fenced routes to the villages.	The respondents representations to the Submission DPD relate to the whole of the triangle bounded by Cambridge, Girton and the A14. It is reasonable that the policy requires a Countryside Enhancement Strategy for this area. Even if there were land ownership issues, the policy objective would remain sound and there would need to be negotiations with other landowners to seek to make such provision. Similar policy objectives have been sought through other major developments where similar land ownership issues arise. The Cambridgeshire Horizons Green Infrastructure Strategy specifically identifies this area for a Countryside Enhancement area. The proposed policy also refers to links to the areas beyond the triangle in the interests of providing access to the countryside for the new urban extensions. The existing agricultural bridge over the A14, and any replacement bridge required as part of the A14 improvements, provides an excellent opportunity to provide such access for the development. It would also provide the opportunity for wider benefits in term of potentially cycle links to the villages north of the A14, particularly in view of the difficulties in providing cycle and pedestrian access at the Histon A14 junction, which will become more difficult with the proposed widening. It is positive to note that the respondent seems willing to discuss ways in which links to the wider countryside outside its control may be possible and discussions should take place with all necessary parties as discussions about the proposed development progress.
POLICY SP/1a - 17			
22971 - Barratt Strategic	Object	The final sentence of paragraph 17 makes reference, if practicable, to mitigating existing flooding in the villages of Histon and Impington. Whilst quite clearly any planning application will mitigate the impact of the development, mitigating flood risk in Histon and Impington which are existing issues, could wll be beyond the scope of the development. Reference to this issue should be deleted.	It is reasonable and appropriate to seek to mitigate existing problems downstream in the villages of Histon and Impington if this is practicable. This principle has been established in the Northstowe Area Action Plan. The issue would need to be explored through any planning application.
POLICY SP/1a - 19			
22972 - Barratt Strategic	Object	Whilst the contents of paragraph 19 is noted, the Inspector's attention is drawn to the Orchard Park "Arbury" development to the east of Histon Road, directly abutting the southern boundary of the A14. On this site development is under construction within the AQMA and therefore the existence of the AQMA should not be taken as an absolute ban on development. Evidence submitted at earlier sessions regarding this issue is relevant.	The Council has made clear its position on this issue at the examination. There is a distinction to be drawn between Orchard Park where residential development is proposed as an alternative to another approved use that was granted planning permission before the Air Quality Management Area (AQMA) was designated, and an entirely new allocation for development in an area where the AQMA is already designated.

Representations	Nature	Representation Summary	Council's Assessment
POLICY SP/1a - 20			
22973 - Barratt Strategic	Object	Whilst paragraph 20 is noted, this essentially deals with a detailed Section 106 matter and is reliant on co-operation from a number of statutory and non-statutory bodies. There should, therefore, be flexibility in the wording of paragraph 20 so that, for example, should be no single management strategy covering recreation, landscape and biodiversity then the application as a whole should not be deemed to be unacceptable.	It is important that not only are the services, facilities, landscape and infrastructure needed by the development provided to a high quality, but also they are properly and effectively implemented, managed and maintained if they are to meet the needs of the community in the long term. There would be advantages in single landownership to avoid fragmentation and assist in effective management. This particularly applies to the open areas for recreation, landscape and biodiversity. The proposed policy is not specific about the number of management strategies. However, there should be a single agreed Management Strategy covering recreation, landscape and biodiversity. The inclusion of water and drainage features within open spaces would have significant advantages to ensuring a holistic approach to the management of open spaces where the respective needs of the various land uses and functions within those spaces can be addressed and should therefore be investigated. This approach is consistent with the policy wording in the three adopted Area Action Plans that has been found to be sound by the Inspectors.
POLICY SP/1a - 21			
22974 - Barratt Strategic	Object	Paragraph 21 covers a matter conventially dealt with as part of a Section 106 agreement and in terms of its current wording is extremely detailed. By way of example, it is noted that traffic flows "will be monitored"; is the developer, therefore, required to fund such monitoring?	The proposed policy seeks to address the key issues relating to this site and matters that would have been addressed had an Area Action Plan been prepared for this site. The policy approach is entirely consistent with policies in the three adopted Area Action Plans. It is reasonable that monitoring of the effects of construction traffic is carried out and funded by the developer to ensure that the public have a mechanism to feedback any concerns that arise during development. This is particularly important for large developments that will be under construction for a number of years.
POLICY SP/1a - 22			
22975 - Barratt Strategic	Object	Paragraph 22 makes reference to recycling construction waste both during construction and in the long term. Clarity is necessary in relation to the reference to the longer term in so far as this refers to construction waste.	This relates to recycling of all construction waste arising from the development, whether it is recycled during construction or afterwards. It is accepted that the current wording is not clear. Clarification is proposed. ACTION
			Revise first sentence of section 22 of proposed Policy SP1/a to read:
			"Development at North West Cambridge will be required to recycle construction waste arising from the development within the site, except for materials where off-site treatment would be more appropriate"
a.2			
22976 - Barratt Strategic	Object	The reference to 920 dwellings should be replaced by 1,348 dwellilngs in paragraph a.2 of the supporting text to Policy SP/1a.	The number of dwellings reflects the Council's preferred site. A change would only be required if the Inspector concluded a different site or capacity was appropriate.

Representations	Nature	Representation Summary	Council's Assessment
a.6			
22978 - Barratt Strategic	Object	The District Council wishes to ask Cambridge City Council to secure contributions to the preparation of the Countryside Enhancement Strategy referred to at paragraph 16 of the proposed policy SP/1a. This particular issue is considered wholly unreasonable and unrelated to the content of the Cambridge City application and the purpose of the Site Specific Policies DPD , the subject of this Examination. There is no requirement in planning policy terms for the Cambridge City application , due to be determined shortly , to provide any mitigation whatsoever within South Cambridgeshire. The Objector's comments relating to paragraph 16 are also relevant.	This approach is consistent with that included in the Cambridge Southern Fringe Area Action Plan where countryside enhancement is sought adjacent to a development taking place in both South Cambs and Cambridge City. The NW Cambridge site will adjoin proposed development in Cambridge City and together will be a sizable urban extension to Cambridge in the order of 2700 dwellings. The Cambridgeshire Horizons Green Infrastructure Strategy proposes a Countryside Enhancement Area in the countryside adjoining development in this sector. The Council considers it is reasonable to ask Cambridge City Council in its determination of the application for development in Cambridge, to secure contributions to the preparation of the Countryside Enhancement Strategy referred to in the policy and its implementation.
22977 - Barratt Strategic	Object	Paragraph a.6 relates to paragraph 16 of the proposed policy SP/1a and provides additional information regarding the content of the countryside enhancement strategy. It is not clear what the reference to a replacement facility for the current public footpath refers and clarity on this point is sought.	There is a public right of way running along the district boundary. This currently runs through open countryside. It will be incorporated within the built up area through the developments in Cambridge and South Cambs. Consideration should be given through the preparation of a Countryside Enhancement Strategy whether the public footpath should be rerouted, or a new footpath provided, into the countryside adjoining the development.
a.8			
22979 - Barratt Strategic	Object	Whilst the content of paragraph a.8 is noted, the Inspector's attention is drawn to the existing playing fields for Anglia Ruskin University which are lit and fall within the strategic gap between Girton and Cambridge. Clearly, therefore, such playing fields and their associated paraphernalia can be seen as acceptable within an open countryside location.	The principle of locating playing fields in the Green Belt is accepted. However, the location of such uses does need to have regard to the impact on the purposes of the Green Belt in the particular location. In the context of the proposed development, it is important that the green belt between Girton and the new development when viewed from the A14 and any new footpaths in the countryside adjoining the development, is clearly countryside and has an open character to perform its separation function. The existing playing fields are located further south and do not have an adverse impact on the separation function of the gap when viewed from the north. The supporting text seeks to ensure that any new playing fields, which for example may be associated with the proposed secondary school, do not reduce the impact of the separation in an unacceptable way. The nature of fencing and any need for floodlighting would potentially have an impact and the text highlights that needs to be properly considered.
a.9			
22980 - Barratt Strategic	Object	The figure of 920 units should be replaced with 1,348 units in paragraph a.9 of the supporting text and reference to a specific density should be removed in full as explained in relation to the policy wording above.	The number of dwellings reflects the Council's preferred site. A change would only be required if the Inspector concluded a different site or capacity was appropriate.

Representations	Nature	Representation Summary	Council's Assessment
POLICY SP/7c Fulbourn at	nd Ida Dai	rwin Hospitals	
23002 - RSPB	Object	The RSPB recommends that the aim to improve access to high quality public transport for the Ida Darwin Hospital be made a requirement, reflected in policy SP/7c. The RSPB believes that there is scope for enhancement of biodiversity at the site, through creation of green space, in preference to the proposals for reversion of the western part of the site to open countryside, to maintain the character setting of the area. The soundness of the plan should also be improved through inclusion of requirements to incorporate energy	The Development Control Policies DPD includes polcies which will guide the details of the development of the site including iversity (policy NE/8), energy efficiency (policies NE/1, NE/2 and NE/3) and water conservation (policy NE/12).
		efficiency and water conservation measures in the redevelopment of the Ida Darwin site.	
22926 - Cambridgeshire & Peterborough NHS Foundation Trust	Object	EITHER: the land comprising Ida Darwin East and the Fulbourn Hospital site should be removed from the Green Belt and reference to the Green Belt and Policy GB/4, together with the reference to footprint, should be removed from proposed Policy SP/7c.	The proposed changes concerning flexibility in terms of floorspace and height of the development are unnecessary. These are matters which can be addressed through the masterplanning of the site within the overall guidance of national planning policy and Development Control Policies DPD policy GB/4 for 'Major Developed Sites' in the Green Belt.
		OR: Policy SP/7c should be amended to state that development should largely reflect the principles as established in Policy GB/4 and permit flexibility in terms of overall floorspace and height of the redevelopment.	
		Alterations to the policy need to be made as the totality of the proposed development would be contrary to the provisions of Policy GB/4 2.e. (i), (ii) and (iii).	

Representations	Nature	Representation Summary	Council's Assessment
22885 - Countryside Properties (Special Projects) Limited	Object	We are concerned about this site given the uncertainty over the footprint required for the new hospital buildings and the ability of the Fulbourn Hospital site to accommodate the new buildings. Fulbourn Hospital is in the Green Belt and it is very important in landscape terms that it should not be compromised. A careful balance will be needed to ensure that development on the eastern side is not over-dominant and sufficient land on the western side of the site is undeveloped to provide separation. The new hospital facilities at Fulbourn Hospital will need to be provided before the buildings at the Ida Darwin Hospital can be demolished and any delays will result in delay to the housing. We query the assumption that 250 to 275 dwellings can be accommodated on the site. We suggest between 100 and 125 units is a more realistic capacity for this site although are concerned about this site's inclusion to meet the housing shortfall, given its lack of certainty.	The Ida Darwin Hospital site is part of an identified Major Developed Site in the Green where local and national planning policies allow for redevelopment which in summary would: (a) have no greater impact than the existing development on the openness of the Green Belt; (b) contribute to the achievement of the objectives for the use of land in Green Belts (c)not exceed the height of the existing buildings; and (d) not occupy a larger area of the site than the existing buildings. In this case concentrating housing development adjoining Fulbourn village will allow the western and higher part of the ida Darwin Hospital site to be cleared of development. Overall the reconfiguration of development will have no greater impact on the Green Belt than that which already exists. The Mental Health Trust is currently exploring its future health care provision at Fulbourn, and the potential for residential development on part of the Ida Darwin site. They anticipate completion of a master plan in Spring 2009. They currently anticipate that the majority of the Ida Darwin site could be redeveloped by 2016, with a combination of residential development and new open space. The exact capacity will depend on the trade off of floor space detailed earlier in this appraisal, and the detailed design of the site. The Trust indicate a phased approach to development, with the majorit of the site available for redevelopment prior to 2016. A figure of 215 dwellings has been utilised, based on the lower 250 dwellings figure allowing minus 15% of the site to come forward post 2016.
Annendix H - Revised		ach to Chesterton Sidings	(as indicated in their illustrative masterplan August 2008). This is considered to be a robust minimum figure for land supply purposes.
Appendix H - Revised	l Appro	ach to Chesterton Sidings	(as indicated in their illustrative masterplan August 2008). This is considered to be a robust
	d Appro	ach to Chesterton Sidings The City Council support the changes to the policy approach for Chesterton Sidings, and this reflects the City Council's agreed approach to pursue an employment led development for the rest of the Northern Fringe East site, alongside the development of a railway station and interchange facility. The City Council will work with South Cambridgeshire to prepare a new planning framework for this area, as set out in paragraph 6.7 of the new supporting text to policy SP/18: Rail Infrastructure. This would be developed under the remit of the Joint Plan Making Committee (Section 29 Committee).	(as indicated in their illustrative masterplan August 2008). This is considered to be a robust
6.7	Support	The City Council support the changes to the policy approach for Chesterton Sidings, and this reflects the City Council's agreed approach to pursue an employment led development for the rest of the Northern Fringe East site, alongside the development of a railway station and interchange facility. The City Council will work with South Cambridgeshire to prepare a new planning framework for this area, as set out in paragraph 6.7 of the new supporting text to policy SP/18: Rail Infrastructure. This would be developed under the remit of the Joint Plan Making	(as indicated in their illustrative masterplan August 2008). This is considered to be a robust minimum figure for land supply purposes.

Appendix I - Revised Proposals Maps

I

22913 - Cambridgeshire & Peterborough NHS Foundation Trust

Representations

Object

As identified on the attached maps, Inset No. 35 Fulbourn Maps 1 and 2 should be amended so that the Major Developed Site in the Green Belt designation at Fulbourn Hospital and on the Ida Darwin site only refers to land in the ownership of the Cambridgeshire & Peterborough NHS Foundation Trust, in accordance with the Development Control Policies DPD Policy GB/4.

Proposed Policy SP/7c should also relate to the same area.

To do otherwise is misleading and erroneous.

Nature Representation Summary

The Major Developed Site in the Green Belt appropriately includes the whole of the built footprint of the original Fulbourn and Ida Darwin Hospitals. The fact that the eastern part of the Fulbourn Hospital site is now Capital Park business park and is no longer in the Trust's ownership does not change the appropriate planning policy and boundary for the whole site. Proposed Policy SP/7c appropriately applies to the whole major developed site which must be considered as a whole in order to ensure no overall adverse impact on the Green Belt through development on any part of the Major Developed Site.

Council's Assessment

Appendix J - Sustainability Appraisal Summary Matrix

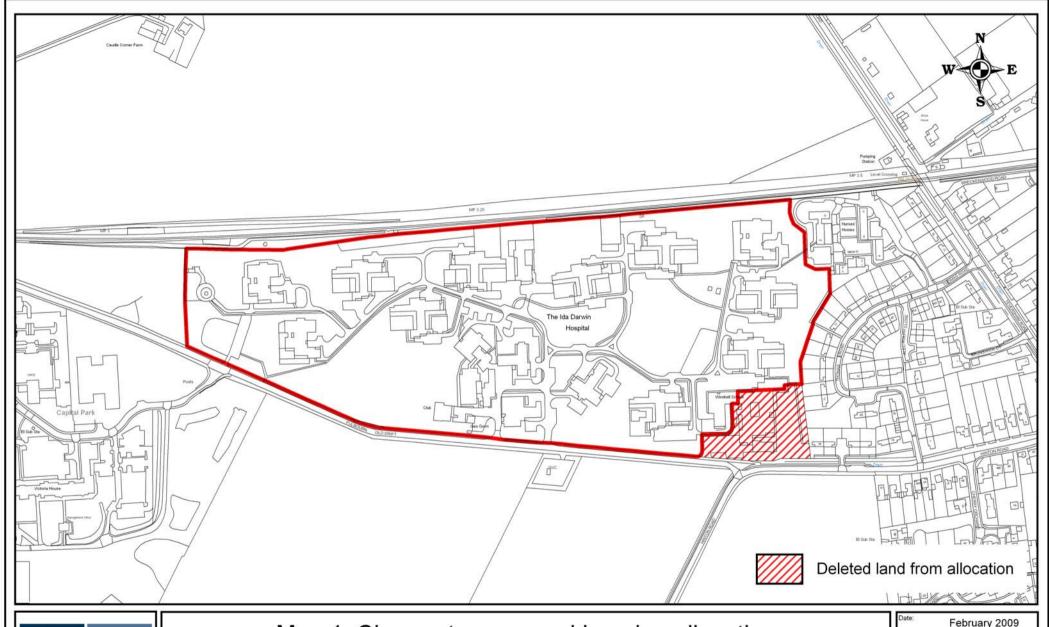
Appendix J - Sustainability Appraisal Summary Matrix

22811 - Countryside Properties (Special Projects) Limited

Object

There are inconsistencies and inaccuracies in the scoring with the Sustainability Appraisal.

The respondent has commented on the detailed sustainability appraisal of the Bourn Airfield site and explained either why they disagree the appraisal or why its proposals will address any issues. The appraisal was carried out by independent consultants for the Council against consistent sustainability criteria that enables a comparison of the relative sustainability merits of the site options tested, and is the consultant's view of the impact that development on a particular site would have on the sustainability criteria. Neither the SA nor the Council's own site assessments can or should have significant regard to the details of a specific proposal which have no weight in the plan making process and are only one example of how a site could be developed. The SA and the site assessments must consider in principle whether development would be appropriate on a particular site and for those sites where development is found to be appropriate, the policy requirements necessary to ensure that any site specific considerations will be taken into account in whatever specific proposal may come forward. The Council remains confident that the SA is a sound tool to inform the assessment of the appropriate new housing allocations to address the housing shortfall.





Map 1: Change to proposed housing allocation The Ida Darwin Hospital, Fulbourn Date: February 2009
Produced by: Simon Parker
Service: Planning Policy
Scale: 1:4000 @ A4

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