

Appendix 1

Sustainability Appraisal Scoping Report

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Public Participation Report

Part A Introduction

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>District Council's Assessment</i>	<i>Approach to Draft DPD</i>
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Part A Introduction

1. Purpose of this document

3166 - South Cambridgeshire Primary Care Trust	Comment	From the perspective of the health economy the key element of this process is the sustainability appraisal. Public Health and Health Service objectives found in key local and national strategic policies should be included in the appraisal and reflected in the developing planning documents.	Agree that public health objectives should be reflected in the study, identified through the review of relevant plans and programmes. The Scoping Report has attempted to do this, by including a number of relevant strategies.
4636 - Bayer CropScience Ltd	Comment	Generally support. Bayer CropScience Ltd are aware of the Sustainability Appraisal Scoping Report in line with government guidance. Whilst Bayer CropScience Ltd do not necessarily agree with every statement in the document, the Company welcomes the platform it provides and will have regard to the sustainability objectives in preparing any brief for the site.	General support noted.

Representations

Nature Representation Summary

District Council's Assessment

Approach to Draft DPD

Part B Methodology

3. General approach

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>District Council's Assessment</i>	<i>Approach to Draft DPD</i>
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3250

Comment	<p>1. Challenges the basic approach to the production of the document.</p> <p>2. Questions the validity of key criteria for assessment of environmental and sustainability.</p> <p>3. The use of theoretical matrices for assessment as against common sense.</p> <p>4. Confusion rather than clarification of issues and criteria.</p>	<p>The representation refers to the lack of a key indicator relating to transport. The Scoping report is intended to provide a baseline against which to test future proposals.</p> <p>The sustainability appraisal objectives focus on desired outcomes, such as reduced pollution, rather than measures which would help achieve them.</p> <p>The existing problems relating to transport are acknowledged in the baseline assessment. This section specifically focused on identifying real key issues facing the District, utilising statistical data. This lead to the development of suitable Decision Making Criteria, which are used in appraisal to determine whether an impact will be positive or negative, and the scale of the impact, on an objective. With relation to transport they include - 'Will it reduce traffic volumes?' 'Will it support travel by means other than the car' 'Will it improve accessibility to key local services'.</p> <p>The use of matrices is an essential part of a complex process. They will not specifically be used to justify policies that defy common sense, but instead provide a neutral detailed assessment of the outcomes of a policy on social, economic and environmental factors, in order to assist decision making.</p> <p>The full appraisal of draft LDF documents, building on the initial appraisals of the preferred options, will provide vital supporting information to those considering new planning policies. It will include a summarised version, to make the documents more accessible to members of the public.</p>		
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Representations**Nature Representation Summary****District Council's Assessment****Approach to Draft DPD***4. Review of documents and objectives*

3187 - South Cambridgeshire Primary Care Trust	Comment	From the perspective of the health economy the key element of this process is the sustainability appraisal. Currently it is mandatory that a strategic environmental assessment and a sustainability assessment are undertaken. The former concentrates on environmental effects and the latter is concerned with the full range of environmental, social and economic matters. It is recognized that health is inextricably linked to these factors and needs to be considered in any appraisal as they are fundamental to developing sustainable communities. Health objectives found in key local and national strategic policies should be included in the appraisal.	Agree that public health objectives should be reflected in the study, identified through the review of relevant plans and programmes. The Scoping Report has attempted to do this, by including a number of relevant strategies. The objectives reflect health issues, but it is important that a comprehensive set of decision making criteria are created to examine impacts on the objective. Expanded references to health can be developed, in partnership with the PCT.	Update review of relevant plans and strategies to provide more detailed review of health issues. Develop additional decision making criteria where appropriate.
5143 - Ramblers' Association Cambridge Group	Comment	<p>Para 4.7</p> <p>We would like to see Objectives 2.3 & 5.3 (Ch 4, Table 1) extended to include access to to the wider countryside and the whole network of public rights of way, and the corresponding indicators widened to include general rights of way data, including baseline data which are now available from the County Council's Rights of Way Condition Survey.</p>	<p>1) As objectives focus on outcomes, it would be inappropriate to include an objective relating to rights of way. As they are a means of accessing the countryside and wild places, the impact of policies on them should be assessed. Therefore a suitable Decision Making Criteria should be developed.</p> <p>2) An indicator has been included in the baseline data, but at time of publication no data was available. Through ongoing monitoring and data collection information will be included when it becomes available.</p>	Include new decision making criteria: Will it improve access to to the wider countryside through the network of public rights of way?

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5. Indicators and data collection

5144 - Ramblers' Association
Cambridge Group

Comment Para 5.3

We would like to see Objectives 2.3 & 5.3 (Ch 4, Table 1) extended to include access to the wider countryside and the whole network of public rights of way, and the corresponding indicators widened to include general rights of way data, including baseline data which are now available from the County Council's Rights of Way Condition Survey.

Repeats representation 5143.

6. Key issues and consultation

3193 - South Cambridgeshire
Primary Care Trust

Comment

It is important that there is an ongoing dialogue between the PCTs and those leading the planning process. This would better ensure that all the factors necessary for a healthy sustainable community are identified and considered in the development of the Local Development Framework.

Agreed. The Council will endeavour to work closely with PCT, through the Local Strategic Partnership.

*Representations**Nature Representation Summary**District Council's Assessment**Approach to Draft DPD**Part C Baseline Assessment**8. Land & Water Resources*

5442 - Ramblers' Association Cambridge Group	Comment Para 8.3	We note the lack of baseline data for the impact of increased water consumption on the natural environment, and on the damage to designated sites. Informal observations suggest that there is already a problem with excessive water extraction, and we think there ought at the very least to be firm baseline data available for both indicators, before committing to any further major development.	Water consumption is identified as a key local issue in the report, and there are appropriate objectives and Decision Making Criteria. There is a lack of quantifiable data at the local level. When data becomes available it will be utilised in future monitoring.
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9. Biodiversity

4174 - Cambridgeshire County Council	Comment The section makes no reference to "Cambridgeshire Landscape Guidelines"	The Cambridgeshire Landscape Guidelines have been identified as a relevant strategy, and is included in the Scoping Report.
5441 - Ramblers' Association Cambridge Group	Comment Para 9.3	We note the lack of baseline data for the impact of increased water consumption on the natural environment, and on damage to designated sites. Informal observations suggest that there is already a problem with excessive water extraction, and we think there ought at the very least to be firm baseline data available for both indicators, before committing to any further major development.

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10. Landscape, Townscape & Archaeology

6474 - English Heritage	Comment	Para 10.4 After the third sentence, we suggest the addition of 'The Green Belt helps preserve the character of Cambridge by limiting its outward spread, thereby ensuring the compact urban form of the historic settlement is maintained. The character and setting are preserved also by preserving the rural character.'	The paragraph already sufficiently conveys the importance of the green belt to preserve the historic character of Cambridge.	
6475 - English Heritage	Comment	Para 10.7 This paragraph needs to be expanded to refer to the Historic Landscape Characterisation data now being completed by the county. This approaches the historic landscape in a holistic way, and while we welcome the identification of Registered Parks, and other features, the subject needs to be addressed in the wider sense too.	Agree reference should be made to Historic Landscape Characterisation information that will become available.	Refer to Historic Landscape Characterisation.
6476 - English Heritage	Comment	Landscape, townscape and archaeology table, page 22 In issue 1, it would be helpful to reflect the issues in the Council's own Green Belt study by Landscape Design Associates. The term 'hemming in' is rather unclear, and the study might provide the necessary clarity.	Agree this could be clarified. The qualities of the Cambridge green belt in the LDA study are as follows: A large historic core relative to the size of the city as a whole; A city focused on the historic core; Short and/or characteristic approaches to Cambridge from the edge of the city; A city of human scale easily crossed by foot and by bicycle; Key views of Cambridge from the landscape; Significant areas of distinctive and supportive townscape and landscape; Topography providing a framework to Cambridge; A soft green edge to the city; Green fingers into the city; Designated sites and areas enriching the setting of Cambridge; Long distance footpaths and bridleways providing links between Cambridge and the open countryside; Elements and features contributing positively to the character of the landscape setting; The distribution, physical separation, setting, scale and character of necklace villages; A city set in a landscape which retains a strong rural character.	Utilise LDA green belt study to clarify green belt issues.

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11. Climate Change & Pollution

5243 - Swavesey IDB

Support

Pleased that report acknowledges that: flooding is becoming an increasingly important issue; Impact on drainage systems must be considered when considering development control issues; Clay soils in the district are not suitable for use of SuDS.

Noted.

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<i>12. Healthy Communities</i>				
2796 1506 - British Horse Society (Cambridgeshire)	Comment	Support Key Sustainable Issue 2 - inclusion of horse riding. Riding for leisure and recreation in the countryside can be undertaken by all. Its a healthy pastime, with very low impact on the natural environment.	Noted.	
3199 - South Cambridgeshire Primary Care Trust	Comment	The PCT acknowledges the amount of thought and energy that has been invested in the Sustainability Appraisal. Although we have concerns about the profile of health in the document they recognize that it also presents an opportunity to explore these concerns and contribute to the further development of the appraisal process. These could include specialist input to the Key Sustainability issues for Healthy Communities and demonstrating the impact of the growth on local Health Services.	The Council will continue to work with the PCT to ensure appropriate health issues are addressed.	
5009 - Sport England	Object	Sport England supports this section due to its inherent recognition that open space standards and sports facilities play an essential role in maintaining healthy communities. Objective 4 relating to improving the quantity and quality of publicly accessible open space is therefore welcome. However, this section is objected to because it is requested that sports facilities is added to this objective, in recognition that built sports facilities play a similar role to outdoor facilities that are located within open space. This would be consistent with paragraph 12.6, which refers to such facilities in larger villages.	There is a degree of cross referencing required when considering objectives, as a judgement must be made as to how to categorize issues. Objective 6.1 on inclusive communities covers access to services and facilities, including leisure. This covers built sports facilities.	

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<i>13. Inclusive Communities</i>				
2798 1507 - British Horse Society (Cambridgeshire)	Object	Horseriders are frequently not considered in Cambridgeshire although valued in other parts of the country for their contribution to the community, including rural economy.	The issue of provision for horse riding is covered in the healthy communities section of the report.	
2799 - Addenbrooke's Hospital	Support	The Trust welcomes the comments contained in the Inclusive Communities section of this report.	Noted.	

14. Economic Activity

2800 1508 - British Horse Society (Cambridgeshire)	Comment	Farm diversification into tourism (particularly horse based) promoting public rights of way, including links to national routes.(i.e walking and riding holidays with bed and breakfast facilities) would help to reduce the dependence of vehicular travel.	The Council is supportive of appropriate farm diversification, which could include development for equestrian tourism. Provision for horse riding is dealt with through the healthy communities section of the report.	Emphasise potential links between farm diversification and tourism, including equestrian tourism.
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Appendices

1. Relevant plans/programmes reviewed

3205 - South Cambridgeshire Primary Care Trust	Comment	Key, up to date , Public Health and Health Service documents were made available but have not been used in developing the appraisal or in identifying relevant appraisal objectives. As a result, this has not led to any expansion of health issues and also there were limited links made between non-health plans and strategies and their impact on health.	It is acknowledged that not all strategies highlighted were included in the consultation draft. The Council will work with the PCT to include all relevant strategies.	Include PCT Local Delivery Plan in review of strategies.
4175 - Cambridgeshire County Council	Comment	The list of National plans and programmes should be updated to include recently published programmes such as PPS11 Regional Spatial Strategies, and PPS12 Local Development Frameworks. It would also be more informative to give the subject title of all these documents.	The documents listed were not published at time of publication. The scoping report will require periodic updates to ensure it is up to date. The subject title of documents can be added to a final version.	Add document titles to appendix 1.

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2. Analysis of appraisal objectives

4177 - Cambridgeshire County Council	Comment	Some further clarification of this table would be helpful. There is no explanation for some text being bold and other not. It could also be made clearer whether the purpose of the "Implied Amendments to Core Objectives" column is to definitely alter the core objectives of the LDF or not.	The bold type indicates where amendment may be required to the ODPM possible set of objectives detailed in 2003 interim guidance on SEA/SA, where relevant strategies indicate additional points should be included. This approach is made clear in section 4 of the Scoping Report.	
4179 - Cambridgeshire County Council	Comment	<p>Waste Local Plan</p> <p>Reference to the Draft Waste Local Plan should be updated to refer to the adopted Plan 2003</p> <p>Climatic factors</p> <p>In the "Climatic factors" column for the Structure Plan, the word "omissions" should be replaced with "emissions".</p> <p>Social inclusiveness</p> <p>In the analysis of the Structure Plan the "Social Inclusiveness" column should include a reference to affordable housing as it is both a challenge and a key issues for the area, and this fact has been recognised in Structure Plan Sustainable Development Strategy Objective 2f</p>	Agree.	Update to include Adopted Cambridgeshire Waste Local Plan 2003. In the 'Climatic factors' column for the Structure Plan, the word 'omissions' replace with 'emissions'. In the Structure Plan 'Social Inclusiveness' column include a reference to affordable housing.

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4642 - Sport England	Object	Objection is made to the schedule of Regional Plans and Strategies, because the East of England Plan for Sport (2004) has not been included as a document that has been considered as part of the SEA process. The plan is considered to be a relevant document for consideration as part of the SEA process, as there may be implications to the core objectives of the documents that have been prepared as DPDs. The document is also considered to have similar status (and therefore should be afforded similar weight to the other regional plans.	Agree.	Include East of England Plan for Sport (2004) in review of plans and strategies.
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6. Baseline data and indicators

6477 - English Heritage	Comment	Indicators, page 83 The indicators for the historic environment require some further work. We would welcome the chance to discuss these with you.	Noted.	
2697 - Wildlife Trust for Bedfordshire, Cambridgeshire, Northamptonshire & Peterborough	Comment	Modify indicators to make more relevant to planning process Detailed suggestions made in text of representation.		Indicators have been chosen from the best available data. The SSSI indicator is not ideal, and future data sources for other indicators will be explored. The progress toward BAP targets indicators are still being developed. The Council will endeavour to work with the County Council to ensure they provide a useful indicator.