

Appendix 4

Urban Capacity Study

Urban Capacity Study

Public Participation Report

<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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Chapter 1: Introduction

Chapter 1: Introduction

5673 - Willingham Parish Council	Comment	<p>With regard to paragraph 1.2: The original concept of Northstowe as a town of six to eight thousand homes seems to have been lost with suggestions that it might now be in excess of ten thousand. It is going to put huge pressure on local communities if Northstowe is allowed to expand to this size. The LDF should address this issue and cap the town at an absolute maximum of eight thousand homes. The plan should go further in restricting development to the south of the existing railway line and establishing permanent green belts between the new town and the surrounding villages. If more homes are needed they should be provided in another new town location built on a similar scale.</p>	<p>The Urban Capacity Study does not indicate the eventual size of Northstowe, and only refers to figures from the Structure Plan.</p>	
4181 - Cambridgeshire County Council	Comment	<p>Executive Summary</p> <p>Table of details</p> <p>This section (or alternatively, Chapter 10 Conclusion) would be improved by the inclusion of a table which disaggregates the total capacity of 2971 dwellings in "rural areas" into its different elements (existing allocations, large windfalls etc). The table could also include details of how the 20000 dwellings 1999-2016 add up (showing completions 1999-2003; strategic sites etc)</p>	<p>Agree.</p>	<p>Include tables of housing figures in final version to improve clarity.</p>

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4184 - Cambridgeshire County Council	Comment	Para 1.2 Role of UCS Agree that the UCS, through its assessment of the capacity of rural areas (villages), has an important role in showing whether the overall LDF strategy is robust and deliverable - in terms of providing 20000 dwellings 1999-2016	Noted.	
4186 - Cambridgeshire County Council 2493 - FPDSavills	Comment	General support for the methodology used.	Noted.	
3720 - House Builders Federation	Comment	It is normally of course the case that UCS's look at housing land availability very largely with an urban focus, but including those village settlements with sizeable populations. South Cambridgeshire obviously by its very physical nature does not conform to this stereotype. However, given the inevitability of widening the search beyond normal urban confines, it is therefore essential that any identified housing capacities are still both realistic and viable in rural localities given the national and regional emphasis on sustainable development (which many local authorities in policy terms normally in the determination of actual planning applications choose to define as only primarily large urban areas).	Noted. The study does attempt to identify viable opportunities on a sustainable scale inline with the settlement hierarchy.	

Representations**Nature Representation Summary****District Council's Assessment****Approach to Draft DPD****Chapter 2: Existing Commitments***Review of existing Local Plan 2004 Housing Allocations*

4188 - Cambridgeshire County Council 1422 - John Martin & Associates 5830 - P B Moore & Sons	Comment	The Local Plan 2004 housing allocations should be reviewed inline with the settlement hierarchy proposed in the LDF.	The UCS includes Local Plan 2004 allocations as they are an important source of capacity in the years up to 2006. As The LDF plan period runs from 1999 to 2016 it is important they are included in the housing capacity figures.
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Review of other existing Local Plan 2004 Allocations

3832 - Huntsman Advanced Materials (Land South of Rectory Road, Duxford)	Comment	WE object to the last sentence of para 2.3 as our site has not been considered within the UCS.	There a number of reasons why this site was not considered in the UCS. 1) It is outside the village framework 2) it is a very large site adjoining a group village, so development would be above the scale examined 3) It is an existing employment site still in active use.
1468 - Cambridge City Council Property & Building Services (Land north of Fen Road, Cambridge)	Object	<p>a) We object to the fact that allocation CNF2 in the 2004 Local Plan has not been considered as offering potential for residential development because this is clearly one of the principal uses proposed for this site.</p> <p>b) We object to the fact that part of allocation CNF6 from the 2004 Local Plan has not been considered as offering some potential for residential development in the Urban Capacity Study. The site, as shown on the attached plan, is considered suitable for residential development.</p>	The UCS specifically examines the requirement for 9600 at villages by the Structure Plan. Cambridge Northern Fringe East is included in the edge of Cambridge sites, examined separately in the housing land supply calculations in the Core Strategy.

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Existing Housing Commitments

4192 - Cambridgeshire County Council	Comment	It is important to make clear what has been counted in capacity results.	The role of the County Council in providing planning monitoring is acknowledged. In preparing the final version, the Council will work in partnership to ensure the most accurate information is utilised, and further detail is included where practical.	Include a breakdown of type of sites included in sites with planning permission.
4191 - Cambridgeshire County Council				
4189 - Cambridgeshire County Council				

Representations**Nature Representation Summary****District Council's Assessment****Approach to Draft DPD****Chapter 3: Small Windfalls Assessment***Chapter 3: Small Windfalls Assessment*

3713 - House Builders Federation	Comment	<p>The use of past rates this must take into account the extent to which past rates are likely to be replicated in the future. It will not be acceptable to refer to past rates from, say the early 90's, if trends since then have been generally downwards and these rates are unlikely to be replicated in the future. We will be looking for a sensible and realistic approach. Similarly with regard to existing permissions and what may become allocations in the emerging LDF.</p> <p>It will not be acceptable to rely on past rates to justify future allowances if, at the same time as projecting past rates forward as future allowances, a large stock of sites are identified through the urban capacity study (UCS) and become allocations in the emerging LDF. Clearly sites, which are identified through the UCS and then allocated for development in the LDF cannot, by definition, come forward unexpectedly as windfalls which they might have otherwise done had they not been identified.</p>	Noted.
3722 - House Builders Federation	Comment	<p>The text demonstrates that 45% of past small windfall completions between 1999-2003 were Greenfield developments. It also correctly states that paragraph 3.36 of PPG3 advises that no allowance should be made in development plans for Greenfield windfalls. The HBF accepts that it is correct for the L.A. to review its existing land allocations as part of the Local Plan process. However, it does not consider that it is appropriate for such sites to be identified and counted towards the potential brownfield land supply within the UCS itself.</p>	<p>Housing allocations are proposed to be rolled forward from the Local Plan 2004. They provide an important element of the land supply particularly for the years up to 2006. They are not included in the windfall figure, but are retained as a separate element of supply.</p>

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1420 - John Martin & Associates 2525 - FPD Savills 5835 5834 - P B Moore & Sons 5201 - Laing Homes North Thames	Object	The small windfall rate is too high, as the number of remaining sites available will diminish.	There is no evidence to suggest that the small windfall rate should be reduced below the predicted rate for the remaining years of the plan period. The study already takes a conservative view based on examination of past rates. Based on the variety of sources of capacity, and high land values, it is likely that small windfalls will continue to be completed. A plan monitor and manage approach will be taken, to monitor completion rates, to ensure sufficient numbers are coming forward. The designation of rural centres will not impact on the small windfall rate, as such sites will be permitted in all types of village, on varying scales.	
<i>Figure 1: Non-estate Completions in South Cambridgeshire 1991 - 2003</i>				
4194 - Cambridgeshire County Council	Comment	Para 3.1 Figure 1: First footnote should state no monitoring survey was carried out in 2000.	Noted.	Para 3.1 Figure 1: First footnote should state no monitoring survey was carried out in 2000.
5150 - Ramblers' Association Cambridge Group	Comment	Para 3.3 We note that "PPG3 para 36 advises that no allowance should be made in developments for Greenfield windfalls". It is part of the Ramblers' Association's remit to oppose Greenfield development and we shall expect the District Council to seek to minimise the use of Greenfield sites wherever possible.	The UCS focuses on development potential within village frameworks. The aim to locate development where it will make best use of previously developed land is an objective of the core strategy.	

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Figure 3: Small windfall completions inside or outside village frameworks 1999 - 2003

4195 - Cambridgeshire County Council	Comment	Para 3.5 The use of a “yardstick” approach in estimating small site windfalls to 2016 is supported in principle. However the UCS should outline how the 87%:13% yardstick for sites inside:outside village frameworks was derived.	It is unclear how further detail could be provided on this issue.	
4196 - Cambridgeshire County Council	Comment	Para 3.5 It needs to be made clear that some of the 1573 dwellings small site capacity will be achieved through sites already with planning permission at 31/3/2003 – see comment re 2.4 above	Agreed	Provide further analysis on existing planning permissions and relationship with small windfalls.
3833 - Huntsman Advanced Materials (Land South of Rectory Road, Duxford)	Comment	We object to para 3.5 as it only takes into account small windfalls within village frameworks, and fails to take into account previously developed sites outside of the village frameworks.	There a number of reasons why this site was not considered in the UCS. 1) It is outside the village framework 2) it is a very large site adjoining a group village, so development would be above the scale examined 3) It is an existing employment site still in active use.	

Representations**Nature Representation Summary****District Council's Assessment****Approach to Draft DPD****Chapter 4: Large Sites Assessment – Study Area***Chapter 4: Large Sites Assessment – Study Area*

4633 - Bayer CropScience Ltd	Comment	Para. 4.1 The urban capacity study needs to be updated to include windfall brownfield development opportunities that have been identified out of the consultation process.	Windfall brownfield development opportunities have been addressed within village frameworks, following the methodology detailed in the study. Redevelopment of major sites in the countryside would need to be addressed strategically through the core strategy.
5697 (Land South of Clay Close Lane, Impington) 5707 - Freshwater Estates Ltd. (Land at 41 Mill Lane, Sawston)	Comment	Sites, if included in the framework, should contribute to the urban capacity study.	The UCS will be updated to reflect frameworks proposed in the submission LDF. If sites are included their capacity will be considered.

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Type 1: Rural Growth and Limited Rural Growth villages

6499 - The Ely Group of Internal Drainage Boards	Comment	Many of the villages in the north of the south cambridgeshire site area are within or in areas which drain into internal drainage districts. The internal drainage board must be consulted on all such development proposals and measures taken to protect each district from any adverse effect of new developments.	Relevant bodies would be consulted as part of planning applications.	
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5678 - Willingham Parish Council	Object	With reference to paragraph 4.3: The LDF defines Rural Centres, Rural Growth and Limited Rural Growth Villages but does not appear to quantify what might be expected from these locations over the plan period. In the case of Willingham, there has already been a huge expansion in the population with very little new investment in infrastructure. The plan should address village growth targets and investment and ensure the two are properly balanced. Further details are attached overleaf.	While the urban capacity study illustrates existing housing allocations within the village of Willingham, further allocations are not proposed. It has not been selected as a rural centre, and the number of dwellings coming forward as windfalls is likely to be limited, as indicated in the UCS. The need for additional services and facilities to meet the needs of new developments is dealt with in the core strategy.	
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Type 2: Group Villages

3839 - Huntsman Advanced Materials (Land South of Rectory Road, Duxford)	Comment	Para 4.4 is unclear; does it seek to exclude the redevelopment of residential sites for residential development? We also object to the arbitrary use of thresholds, a scheme should be assessed on merit.	Paragraph 4.4 is referring to the brownfield site exception not including intensification of residential. The intention of the policy is to support specific redevelopment of a brownfield opportunity. This is reflected throughout the study.	
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Type 3: Infill Villages

4796 - Thriplow Parish Council	Comment	With reference to paragraphs 4.6 to 4.8: Support the above, particularly with reference to the villages of Thriplow and Heathfield.	Support for the approach noted.	
4822 - Arrington Parish Council 4031 - Caxton Parish Council	Comment	Support for current village frameworks and protection of village environment.	The village frameworks will be designated through the Core Strategy.	
5726 - Dixon International Group Ltd	Comment	We object to the lack of assessment of infill villages beyond Heathfield. Other brownfield opportunities exist. This representation should be read in conjunction with our representation on UCS - Sources of Capacity.	Infill villages have been appraised, as capacity would be included in the small windfall rate. This reflects the scale of development that would be permitted by the settlement strategy.	

The Countryside

3840 - Huntsman Advanced Materials (Land South of Rectory Road, Duxford)	Comment	We object to the approach that no potential capacity outside frameworks has been addressed. The results of the UCS results have no regard to contributions some sites could make. Our site should be considered for a residential led development.	There a number of reasons why this site was not considered in the UCS. 1) It is outside the village framework 2) it is a very large site adjoining a group village, so development would be above the scale examined 3) It is an existing employment site still in active use.	
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Representations**Nature Representation Summary****District Council's Assessment****Approach to Draft DPD****Chapter 5: Large Sites Assessment – Sources of Capacity***Chapter 5: Large Sites Assessment – Sources of Capacity*

5204 - Laing Homes North Thames	Comment	Para 7.5 The Council has applied the "population of at least 3,000" criteria too rigidly when identifying Rural Centres.	This issue is addressed in the Rural Centres document.
5209 - Laing Homes North Thames	Comment	It is clear from the inset maps that a substantial amount of land has been identified for large windfall sites. We have concerns about the sites which have been identified. We consider 550 dwellings optimistic given that many sites will be in multiple ownerships and in terms of their appropriateness from a planning point of view and recently adopted policies about levels of affordable housing that may be required on such sites.	The potential difficulties in developing an intensification sites are acknowledged in the very low discounted rate. Policy changes, including revisions to PPG3, and the resulting higher densities becoming more acceptable in planning terms, hence the slightly higher annual rate from this source predicted than in the past.
5727 (Land at 17 Whitcroft Road, Meldreth)	Comment	Site should contribute to urban capacity of Meldreth.	The UCS will be updated to reflect frameworks proposed in the submission LDF. If sites are included their capacity will be considered.

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Previously Developed Vacant and Derelict Land and Buildings

3831 - Huntsman Advanced Materials (Land South of Rectory Road, Duxford) 3829 - Huntsman Advanced Materials	Comment		Windfall brownfield development opportunities have been addressed within village frameworks, following the methodology detailed in the study. Redevelopment of major sites in the countryside would need to be addressed strategically through the core strategy.	
4198 - Cambridgeshire County Council	Comment	Para 5.2 The use of NLUD-PDL data in identifying potential capacity is supported. However the final sentence "where appropriate these are incorporated into the study" leaves the reader unclear whether all or just some of the NLUD-PDL sites have been considered in the discounting process. In general it is better to look at all NLUD-PDL sites (and discount where necessary), rather than to "pre-exclude" sites at the outset.	A number of the sites identified in the National Land Use Database of Previously Developed Land are not suitable to include in this study. In particular Chesterton Sidings, and Oakington Barracks, which are included further up the residential search sequence, and are covered elsewhere in the LDF.	
4199 - Cambridgeshire County Council	Comment	Para 5.3 Greenfield and PDL In line with Government guidance, SCDC consider potential supply from "vacant land not previously-developed" (i.e. Greenfield sites). However SCDC make a distinction between recreation grounds, allotments, parks and informal playspace (which they exclude from consideration), and other types of greenfield site. THIS APPROACH IS NOT SUPPORTED. IT WOULD BE BETTER TO CONSIDER ALL POTENTIAL GREENFIELD CAPACITY (USING THE PPG3 DEFINITION OF GREENFIELD/PDL, AND NOT A LOCAL VARIANT), AND THEN DISCOUNT IF NECESSARY (AFTER APPLYING THE USUAL TESTS INCLUDING THE SEQUENTIAL APPROACH), RATHER THAN TO "PRE-EXCLUDE" TYPES OF SITE AT THE OUTSET.	Given the requirements of PPG17, and the results of the Recreation Study, it would be inappropriate to widen the source to include recreation grounds etc.	

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Redevelopment / Conversion of Commercial Land / Buildings

6592 - Dixon International Group Ltd	Comment	The lack of assessment of employment sites is criticised.	A policy is in place in Local Plan 2004, and proposed in the Core Strategy, to protect local employment. It would be inappropriate and unpredictable to survey all sites given the tests this policy creates.	
3724 - House Builders Federation	Comment	It is stated that in the years 1991 – 2003, 8 former employment sites came forward. Based upon this, the Council suggests that 182 dwellings may come forward from this source between 2003 and 2016. The HBF queries given policy EM8 in the Local Plan, which heavily restricts the ability of employment sites being utilised for other land uses, whether such a number will be capable of being achieved in the future.	Whilst a policy protecting employment land does limit redevelopment for housing, it does include tests that could allow this under certain circumstances. Given the significant windfalls from this source in the last 12 years, in the remaining 12 years of the plan period it would be unrealistic to assume no sites will meet these tests. The figure reflects past rates, and an awareness of sites that have potential to meet the test and provide significant capacity. A plan monitor and manage approach will be taken, to monitor completion rates, to ensure sufficient numbers are coming forward as windfalls to meet requirements.	

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4204 - Cambridgeshire County Council	Comment	<p>Para 5.4-5.7</p> <p>The interaction between policies to increase housing supply (on PDL), and the protection of land in villages in existing business use is obviously crucial to any UCS. The "yardstick" approach based on historic data, that is used by SCDC to estimate future capacity, seems reasonable although the capacity yield of 182 dwellings 2003-2016 is rather low. The consequences of this figure need to be reflected elsewhere in the LDF:</p> <p>a) it means that existing business land in villages will need to play a role in providing premises that reflect changing/modern business requirements.</p> <p>b) the potential redevelopment of existing business land in villages should be taken into account when testing the indicative land take-up estimates set out in Table 2.2 of the Structure Plan.</p>	<p>The figure reflects past rates, and an awareness of sites that have potential to meet the test and provide significant capacity. Redevelopment of employment land for other types of employment is covered by policies in the Core Strategy of the LDF. Table 2.2 in the Structure Plan should reflect the net position with regard to development of employment land.</p>	
<p>3866 - Huntsman Advanced Materials (Land South of Rectory Road, Duxford)</p> <p>3864 - Huntsman Advanced Materials (Land South of Rectory Road, Duxford)</p> <p>4635 - Bayer CropScience Ltd</p>	Comment		<p>Windfall brownfield development opportunities have been addressed within village frameworks, following the methodology detailed in the study. Redevelopment of major sites in the countryside would need to be addressed strategically through the core strategy.</p>	
5728 - Dixon International Group Ltd	Comment	<p>The UCS housing land supply predictions are fundamentally flawed. UCS only considered estate scale commitments from Local Plan 2004, and therefore only focussed on Heathfield. Other brownfield opportunities exist.</p>	<p>The UCS includes all estate scale commitments. However, in infill and group villages only appropriate sites up to a certain scale were included, given the constraints of settlement policies in the local plan, and proposed in the LDF.</p>	

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Intensification of Housing Areas

6440 - Toft Parish Council	Comment	Urban Capacity Study, Page 11, Clauses 5.8-5.16, the Council feels that the distance required between developments is likely to deter applications from residents who wish to make suitable use of larger areas of land surrounding their property and suggests that this either be reduced or not stated in the guidance.	The distances between dwellings utilised in the LDF are not planning policy, but are considered reasonable for assessments of capacity. Actual proposals would be tested against policies in the Local Plan, and in due course the LDF.	
3731 - House Builders Federation	Comment	This source is dependent upon the precise nature and characteristics of sites. A number of factors will mean that it is not always either possible or appropriate to realise such higher rates of delivery as those envisaged. The level of discounting that is applied is considered crucial. Many householders will be unwilling to sell parts of their gardens for new development. This appears to form the bulk of this potential category of supply, which are in multiple-ownership. It is not apparent whether an increase above past delivery rates is realistic given the constraints acknowledged in the text. Additionally, are there going to be policies in the Local Plan that could hinder the capacities for these sites (e.g. backland development, neighbourhood amenity policies, planning gain requirements e.t.c.).	The potential difficulties in developing an intensification sites are acknowledged in the very low discounted rate. Policy changes, including revisions to PPG3, and the resulting higher densities becoming more acceptable in planning terms, hence the slightly higher annual rate from this source predicted than in the past.	

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Redevelopment of Existing Housing – b) Single House in Large Garden:

4206 - Cambridgeshire County Council

Comment Para 5.19

Redevelopment of car parks
 Redevelopment of car parks: the final sentence implies that car parks have not gone through the assessment/discounting process. Our comment is the same as made for para 5.2, that it would be better to assess all sites (and discount where necessary), rather than to "pre-exclude" sites at the outset. Ditto for open space sites

Village car parks were excluded because they offer significant local amenity. Many villages serve a larger rural hinterland were access by public transport is limited.

Farms within Village Frameworks

3728 - House Builders Federation

Comment

The HBF accepts that it is correct for the L.A. to review its existing land allocations as part of the Local Plan process. However, it does not consider that it is appropriate for farmyard sites to be identified and their capacity for 145 dwellings to be counted towards the potential brownfield land supply within the UCS itself.

The figure quoted indicates how many dwellings have been developed from the source □ farms within village frameworks □ since 1991. The sites identified from this source for the remaining years of the plan period could potentially yield 40 dwellings, and are discounted down to 10 dwellings, making it a minor source of capacity. The village framework separates the built up area of the village from the countryside. The area and buildings within should therefore be examined for capacity.

Representations***Nature Representation Summary******District Council's Assessment******Approach to Draft DPD******Chapter 6 : Large Sites Assessment – Identifying Sites******Chapter 6 : Large Sites Assessment – Identifying Sites***

3865 - Huntsman Advanced
Materials (Land South of Rectory
Road, Duxford)

Comment We object to the arbitrary thresholds for housing
development; applications should be determined
on their merits and the quantum of development
should be informed by a merits-based assessment.

Thresholds are utilised in the Local Plan, and
proposed in the Core Strategy of the LDF to ensure
development is restricted to a sustainable scale
relative to the location.

Representations***Nature Representation Summary******District Council's Assessment******Approach to Draft DPD******Chapter 7: Large Sites Assessment – Calculating Capacity******Chapter 7: Large Sites Assessment – Calculating Capacity***

3712 - House Builders Federation	Comment	it is important, when dealing with yield that the policy dimension is factored in. There is no point making assumptions that high densities will be achievable in settlements where such development would be wholly out of character and subject to vociferous local objection. Existing policies, and the extent to which they need to change or remain the same in the emerging LDF policy framework must be factored into this yield assessment.	The policy dimension of yield is factored into the discount rates.
3716 - House Builders Federation	Comment	Any development involving demolitions should not be counted as part of the housing supply, apart from any net additions component.	Reflected in paragraph 5.19 of the UCS, capacity is considered at net rather than gross.

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Density

2528 - FPDSavills	Comment	We accept the density figure of 30 dwellings per hectare and the higher figure of 40 dwellings per hectare for Histon/Impington and Sawston.	Noted.	
5151 - Ramblers' Association Cambridge Group	Comment	Para 7.3 & 7.4 Increased housing density will lead to increased demand for informal recreational facilities, especially access to the surrounding countryside. Additional rights of way should be created, and existing ones protected and maintained as attractive recreational corridors. Large site assessments should include existing and potential availability of off-road access to the surrounding countryside.		Policies on openspace provision in the Local Plan and proposed in the LDF aim to ensure sufficient openspace provision for new developments.

Frequency of Public Transport Service

5152 - Ramblers' Association Cambridge Group	Comment	Para 7.6 In selecting sites for development, consideration should be given to the possibility that increased population will itself encourage improvements in public transport.		Noted, this is acknowledged in the LDF Core Strategy.
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Chapter 8: Large Sites Assessment – Discounting Capacity*Chapter 8: Large Sites Assessment – Discounting Capacity*

5210 - Laing Homes North Thames Comment Para 8.8 recognises many "intensification of housing areas" sites may have significant constraints. We consider that the discounted rate of 10% is still too high given the significant contribution made by rear gardens. Therefore the figure 550 is considered too optimistic and a figure of 225 more realistic.

The potential difficulties in developing an intensification sites are acknowledged in the very low discounted rate. Policy changes, including revisions to PPG3, and the resulting higher densities becoming more acceptable in planning terms, hence the slightly higher annual rate from this source predicted than in the past.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>District Council's Assessment</i>	<i>Approach to Draft DPD</i>
<i>Developability</i>				
3715 - House Builders Federation	Comment	Site constraints in terms of highway access suitability, tree preservation orders, site contamination, conservation policies e.t.c. e.t.c. might have a significant bearing on the actual capability of these sites to come forward.	The discounted rates take account of the fact that many of the sites identified will not come forward for a variety of reasons.	
4207 - Cambridgeshire County Council	Comment	Para 8.2 Involvement of the development industry The House Builders Federation (HBF) in their publication "Realising Capacity" consider that many urban capacity studies fail to adequately reflect the views of the development industry, in terms of the types of sites considered and the discounting assumptions made. The SCDC UCS should outline how the commercial sector has been involved in assessments of "developability" and "market viability"; at present this is not clear.	The consultation on the draft UCS has provided the opportunity for input from the development industry.	
<i>Market viability</i>				
3718 - House Builders Federation	Comment	Studies need to determine whether previously developed sites are available, deliverable and acceptable in public terms. The Local Planning Authority will always remain the final arbiter of public acceptability, but the industry is an essential component in providing the necessary 'reality check' to all three elements of the process.	The discounted rates take account of the fact that many of the sites identified will not come forward for a variety of reasons.	

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<i>Policy constraints</i>				
2802 1279 - British Horse Society (Cambridgeshire)	Comment	Include Rights of Ways as a potential constraint to development.	Agree that Rights of Way should also be listed as a potential constraint. Examination of sites against ROW maps does not lead to the conclusion that discount rates should be adjusted. In most cases routes could be incorporated into new developments.	Include Rights of Ways as a potential constraint to development.
3732 - House Builders Federation	Comment	There are no easy brownfield sites left in most urban areas. Those obvious or easy sites have already been developed in recent years. The majority of the sites which could potentially be developed on brownfield sites in coming years will be far from straightforward to develop and will involve creative and innovative technical and design solutions and require difficult policy decisions to be made if they are to be delivered.	The discounted rates take account of the fact that many of the sites identified will not come forward for a variety of reasons.	
<i>Discounted Rates</i>				
3711 - House Builders Federation	Comment	It is important that discount rates are realistic and that the development industry has had some direct input in assessing the viability and desirability of potential development sites. Furthermore, regard should be had to up to date ownership issues (numbers of owners, owner's intentions for sites e.t.c.). This is actually the most important part of the UCS process, as assumptions need to be realistic, rather than just the identification of a theoretical capacity.	The consultation on the draft UCS has provided the opportunity for input from the development industry.	

Representations***Nature Representation Summary******District Council's Assessment******Approach to Draft DPD******Farms within Village Frameworks***

4208 - Cambridgeshire County Council

Comment Para 8.12

Development of farmyards
 SCDC state that in the past, farms within village frameworks have proved to be a significant source of new housing. It might be better if the discounted rate reflected the policy stance to be taken towards the re-development of farms for housing, rather than the 25% rate based on three farms identified in the study. It could be that the constraints listed are particular to these sites, and are the main reasons that they have not been developed in the past

The discounted rate is slightly higher than the intensification source, after consideration of the constraints. However, due to the limited number of sites the impact of amending the discount rate would be minor.

Representations**Nature Representation Summary****District Council's Assessment****Approach to Draft DPD****Chapter 9: Large Site Survey – Results***Figure 4: Large Site Survey – Housing Capacity By Village*

2534 - FPDSavills	<p>Comment We consider the Council has not identified Rural Centres appropriately given Paragraph 1.17 within the Structure Plan. In addition, we have serious concerns about the identification of large windfall sites in the larger villages given the need for proper planning and a realistic view on site assembly and delivery.</p>	<p>Selection of rural centres is dealt with in the Rural Centres document. The discounted rates provide a realistic view on the number of sites that will actually come forward. A plan monitor and manage approach will be taken, to monitor completion rates, to ensure sufficient numbers are coming forward as windfalls to meet requirements.</p>	
3019 - Papworth Everard Parish Council Planning Committee	<p>Comment Of the three areas indicated within Papworth Everard and shown on the map in Appendix 5: site '42' is heavily wooded and '39' is indicated as informal playspace in the Recreation Study.</p> <p>It may be of relevance that immediately to the SE of site '528' an area of 1.642ha has been granted permission for change from B1 business to residential use.</p>	<p>Site 39 should be deleted from recreation study, as it does not perform that function. Site 42 □ site constraints are considered through the discount rate.</p>	Remove site 39 from recreation study.
3826 - Huntsman Advanced Materials (Land South of Rectory Road, Duxford)	<p>Comment The capacity of our site as part of a residential-led redevelopment scheme should be identified as an allocation and included within Figure 4.</p>	<p>There a number of reasons why this site was not considered in the UCS. 1) It is outside the village framework 2) it is a very large site adjoining a group village, so development would be above the scale examined 3) It is an existing employment site still in active use.</p>	

<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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Testing

4209 - Cambridgeshire County Council

Comment Para 9.2-9.4

Noted.

Windfalls

The testing of the capacity results against historic housing completions data is very useful. However the key result - that the capacity estimate of 42 dwellings pa from large windfalls is (in strategic terms) not substantially different from the 61 dwellings per annum completed in the 1991-2003 period - ought to be given more prominence. Figure 6: First footnote should state no monitoring survey was carried out in 2000

<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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Chapter 10: Conclusion

Chapter 10: Conclusion

1423 - John Martin & Associates	Comment	Our clients consider that the conclusions of the study in paragraph 10.1 & 10.2 should be amended such that the total number of dwellings likely to be developed from windfalls in the remaining years of the plan period be reduced from 2123 to 1850. The capacity arising from the review of Local Plan 2004 Allocations should be amended from 1748 to 1132 at the end of March 2003.	The capacity of Local Plan 2004 allocations at the time of the study is accurate. There is no evidence to suggest the capacity figures should be reduced. A plan monitor and manage approach will be taken, to monitor completion rates, to ensure sufficient numbers are coming forward as windfalls to meet requirements.	
4211 - Cambridgeshire County Council	Comment	Para 10.2 Updating The County Council's Research and Monitoring Team has (in Oct 2004) revised its estimate of dwellings built 1999-2003 to 2762. The UCS should be revised accordingly.	This change is significant, as it means an extra 157 dwellings have been completed. There a significant consequential changes for the study, and other documents in the LDF. It provides even greater support for the core strategy approach to housing allocations.	Amend completions figure 1999 - 2003 from 2605 to 2762. Work with County Council Monitoring Team to ensure the most accurate data is used in all LDF documents.
4212 - Cambridgeshire County Council	Comment	Para 10.1/10.2 Clarification These paragraphs may give the impression that the highlighted figures (2123, 1748, 2605, 4064) are mutually exclusive categories that all contribute to meeting the Structure Plan housing requirement. Additional text is required to explain that some of the permissions are already counted within the 2123 figure (as small sites). It should also be explained that not all of the 4064 dwellings with permission can be expected to be built in the 2003-2016 period. See also comments for 2.4 and for Exec Summary above	Agreed that there is potential for double counting, that must be avoided. The outstanding planning permission figure includes in the order of 330 small windfalls. This should be taken off the small windfalls capacity. Given the additional completions identified, the impact on the LDF Core Strategy is minimal. The Core Strategy interprets housing requirements, and includes a 10% non-implementation allowance.	Reduce small windfall assessment by amount of outstanding planning permissions for small windfalls, to avoid potential double counting.

<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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2541 - FPD Savills
5887 - D H Barford & Co
5212 - Laing Homes North Thames

Comment The Council's windfall estimate is too low.

There is no evidence to suggest the capacity figures should be reduced. A plan monitor and manage approach will be taken, to monitor completion rates, to ensure sufficient numbers are coming forward as windfalls to meet requirements.

Representations**Nature Representation Summary****District Council's Assessment****Approach to Draft DPD****Appendix 5: List of Urban Capacity Maps***Appendix 5: List of Urban Capacity Maps*

2258 - Gamlingay Parish Council 1392 - Gamlingay Parish Council	Comment		Issues are dealt with through similar representation to Core Strategy.
3282	Comment	The identification of rejected options may well encourage applications as departures from the adopted document. Reference to doubts about the site known as Impington 1 and numbered 436 have already been mentioned under other sections.	Identification of all possible sites, and then applying a discounting process, complies with government best practice guidance 'Tapping the Potential'.
1472 - Cambridge City Council Property & Building Services (Land north of Fen Road, Cambridge)	Comment	We object to the fact that land within the built up area of Cambridge has not been considered as part of the urban capacity study, with the exception of Cambridge Northern Fringe West. We suggest that land at Chesterton Sidings should be included in the urban capacity study and also land within other allocations in the built up area of Cambridge eg. CNF6. We believe the land shown on the attached Plan would be suitable for residential development for the reasons set out in the full representation attached.	The UCS specifically examines the requirement for 9600 at villages by the Structure Plan. Cambridge Northern Fringe East is included in the edge of Cambridge sites, examined separately in the housing land supply calculations in the Core Strategy.
3049 - Great Shelford Parish Council	Comment	Many of the sites shown in Gt Shelford have substantial numbers of trees which provide a valuable wildlife habitat. As the surrounding farmland is intensively farmed, the building in large back gardens would adversely affect the local biodiversity especially as a rural growth settlement we are to accommodate densities of 40 houses per hectare.	Such considerations must be considered on a site by site basis through the planning applications process. Such considerations are built into the discounting process.

<i>Representations</i>	<i>Nature</i>	<i>Representation Summary</i>	<i>District Council's Assessment</i>	<i>Approach to Draft DPD</i>
2257 - Gamlingay Parish Council 1391 - Gamlingay Parish Council 1390 - Gamlingay Parish Council 1886 - Sawston Parish Council 2485 2472	Comment	Objections to inclusion of sites: 190, 192 (Gamlingay); 275, 276, 278, & 280, 484, Land south of The Baulks (Sawston). Support inclusion of Site 513 (Sawston).	Identification of all possible sites, and then applying a discounting process, complies with government best practice guidance <input type="checkbox"/> Tapping the Potential <input type="checkbox"/> . If particular sites are removed because of constraints that exist, this would effectively be discounting twice, which would undermine the process of the study. Constraints can be considered in detail through the development control process, and some sites identified may not come forward for development due to reasons detailed in the discounting section of the UCS.	
5295 - Thriplow Parish Council	Comment	Area 525 identified as a housing allocation now has planning permission and should be identified as such. The permission also includes a landscaping area to the west which will continue the western boundary of Area 479 to the A505. Area 479 is identified as a site with planning permission. This site has now been developed.	Prior to submission of the LDF, the UCS will be updated to reflect current information available.	
5740 (Land at Station Road, Linton)	Comment	Site at Station road should contribute towards capacity.	Although this site is within the village framework of Linton, it is currently in employment use. It would need to pass the policy tests on loss of rural employment, before it could be redeveloped for housing. Any capacity from this site would therefore be included in the commercial windfalls figure detailed in the study.	
5909 (Land East of Hinton Way, Great Shelford) 5892 (Land at 12 Cabbage Moor, Great Shelford) 5946 (Land either side of Hinds Loder (Track), Fulbourn) 6000 (Land NW of 11 Cambridge Road, Great Shelford)	Comment	Sites outside village frameworks are proposed to be included as capacity: Land adjacent to Trinity House, Cambridge Road, Great Shelford; Land at Home End, Fulbourn; land off Hinton Way/ Mingle Lane, Great Shelford; camping and caravan site, Shelford Road Great Shelford;	The study focused on areas within the village frameworks. Changes to frameworks are considered through the Core Policies. The UCS will be updated to reflect frameworks proposed in the submission LDF. If sites are included their capacity will be considered.	