

---

**South Cambridgeshire Local Plan –  
Consultation Responses and Consideration  
on whether to submit for examination**

**NOTE: Members are asked to bring their copy of the South Cambridgeshire Local Plan: Proposed Submission (July 2013) to the meeting.**

**Purpose**

1. To consider the responses to consultation on the South Cambridgeshire Local Plan: Proposed Submission 2013 and whether or not a recommendation should be made to a special Council meeting on 13 March that the plan is ready to submit to the Secretary of State for public examination.
2. This is a key decision because it affects all wards. It was first published in the January 2014 Forward Plan.

**Recommendations**

3. It is recommended that the Portfolio Holder agrees the following recommendations to Full Council that:
  - (a) the South Cambridgeshire Local Plan: Proposed Submission document and Proposed Policies Map be 'submitted' for examination in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, together with the sustainability appraisal and associated evidence documents in support of the plan, with proposed Major Modifications (as contained in Appendix A) and proposed Minor Changes (as contained in Appendix B).
  - (b) the following updated and additional evidence base documents be submitted with the South Cambridgeshire Local Plan:
    - Key Issues and Assessment (Update to the Audit Trail at Annex A of the Sustainability Appraisal Report) - Appendix C
    - Statement of Consultation Update – Appendix D
    - Duty to Co-operate Statement Update – Appendix E
    - Great and Little Abington Parish Council Proposals: including consultation leaflet and results of consultation – Appendix F
    - Graveley Parish Council Proposals: including consultation leaflet (if supported by local consultation – update to be provided to Council meeting on 13 March 2014) – Appendix G
    - Sawston Transport Modelling – Appendix H
    - Development Frameworks evidence paper update – Appendix I

- Sustainability Appraisal – update for Parish Council led proposals for The Abingtons – Appendix J
  - Habitats Regulations Assessment update – Appendix K (to follow).
  - Cambourne Retail and Employment Study- Explores retail and employment development in the village and opportunities to support future development – Appendix L.
  - Strategic Spatial Priorities: Addressing the Duty to Co-operate across Cambridgeshire & Peterborough – Appendix M
  - Services and Facilities Study Update – once finalised.
  - Transport Strategy for Cambridge and South Cambridgeshire – to be considered by the County Council’s Cabinet for agreement on 4 March.
- (c) delegated authority be given to the Director of Planning and New Communities to make further additions to the schedules of changes during the course of the examination (except where changes would be of such significance as to substantially alter the meaning of a policy or allocation). The exercise of this delegation to be reported back to Planning Policy and Localism Portfolio Holder through the course of the examination process.
- (d) the Director of Planning and New Communities is authorised to prepare and submit reports, proofs of evidence, technical papers, statements of common ground and other such documents required in the presentation of the local plan through the examination process, reflecting the Council’s agreed position on these matters and to take such other steps as are conducive or incidental to the submission and examination of the local plan.

#### **Reasons for Recommendations**

4. The 7,400 representations made to the Proposed Submission South Cambridgeshire Local Plan during consultation held 19 July to 14 October 2013 have been assessed to see whether any issues have been raised that were not considered by the Council during the Issue & options stage that require changes to the substance of the plan before it is submitted for examination by an independent Inspector. The ‘soundness’ of plan has been tested against the requirements of national planning policy and other legal requirements. Full account has been taken of the issues raised by local residents, stakeholders and the development industry. No changes of substance are necessary to make the plan sound. However, changes are proposed to include Parish Council proposals at Great & Little Abington (and Graveley subject to the outcome of the Parish Council consultation) that have been subject to local consultation since 14 October 2013 as part of the Council’s approach to working with Parish Councils on the Local Plan as part of its response to the Localism Act.

#### **Executive Summary**

5. The Council is updating the Local Plan to replace the Local Development Framework (adopted between 2007 and 2010) that plans for the future of the district up to 2031 and for some proposals that will continue to be developed after that date.
6. Consultation took place in 2012 and 2013 on two rounds of Issues and Options for the new Local Plan. Around 30,000 representations to those consultations were received. They informed the preparation of a Proposed Submission Local Plan, which was subject to consultation in 2013 (19 July to 14 October). 7,400 representations were received to this latest consultation and are summarised and assessed in this report.

7. There are now four options available to the Council for the way forward with the Local Plan. The Council can decide:
  - (a) to submit the Local Plan for examination without any changes.
  - (b) to submit the Local Plan for examination with minor changes that help with the clarity of the plan but do not affect its content.
  - (c) as (b) but to also propose very limited major modifications specifically to incorporate Parish Council proposals that have been produced alongside the Local Plan and where recent local consultation shows clear support for the changes akin to the preparation of a neighbourhood plan.
  - (d) to make more significant amendments (e.g. reword policies to change their meaning, add new sites or delete existing ones), which would require further public consultation and re-consideration by the Portfolio Holder and Council, before submitting the plan for examination.
8. This report includes a number of documents. In particular, a Key Issues and Assessment document has been prepared, which includes a summary of the main issues raised during the consultation on the South Cambridgeshire Local Plan: Proposed Submission 2013 as required by regulations, with an assessment of them and proposed way forward for the Submission Local Plan (see Appendix C, attached to printed copies of the agenda).
9. The Council is responsible for preparing a plan that meets the long term needs of the district and supports its continued success. This must be done in a way that meets the National Planning Policy Framework (NPPF) requirement for sustainable development whilst recognising that it also emphasises the importance of green belt protection unless there are exceptional circumstances warranting change.
10. There is a high level of housing need in South Cambridgeshire reflecting the success of the local economy. This requirement must be balanced with the green belt around Cambridge that exists to protect the character and setting of the world famous historic city, the fact that South Cambridgeshire currently has no towns within its area, and the rural nature of South Cambridgeshire as a whole. In view of these challenges, it would be unrealistic to expect to prepare a plan where there is complete consensus.
11. The Council has listened carefully to the views raised through the two rounds of Issues and Options consultation in 2012 and 2013 and the views received have informed the policies and proposals in the Proposed Submission Local Plan. Concerns that still exist in some local communities about the proposals that most directly affect them, that have been raised in the latest Proposed Submission Local Plan consultation in 2013, have been given further consideration. Developers who have aspirations not contained in the plan and the views of stakeholders have been considered to reach a rounded view before making any recommendations to Members on the plan.
12. Taking all these factors into account, officers consider that the Proposed Submission Local Plan remains an appropriate balance between all competing interests and provides a robust and deliverable plan to meet the needs of the district over the next 20 years. It is considered that the plan is now ready for submission and examination, with changes to incorporate two Parish Council proposals and some minor changes for clarity.
13. The proposed changes are included in the Key Issues and Assessment document but are also captured in two schedules: Proposed Major Modifications (Appendix A) and

Proposed Minor Changes to the plan (Appendix B). These documents are attached to printed copies of the agenda. A number of other appendices also form part of this report and are available on the website, including updates to the Statement of Consultation (Appendix D) and the Duty to Cooperate Statement (Appendix E) to take account of the consultation undertaken July to October 2013. A number of updates to the evidence base are also included to support the Local Plan at submission and are either attached as Appendices F to M or will form part of the submission documents when completed (see paragraph 25).

14. For the Portfolio Holder, the key recommendation is therefore to recommend to the special meeting of Full Council on 13 March 2014 that the Local Plan be submitted for examination with the changes proposed at Appendices A and B.
15. If full Council approves the plan, it will then be submitted to the Secretary of State for examination (a form of public inquiry) by an independent planning inspector.

### **Background**

16. The current South Cambridgeshire Local Development Framework was adopted between 2007 and 2010 and covers the period to 2016. There is an urgent need to replace this plan with a new one that:
  - makes provision for development over a longer time period (to 2031),
  - provides a full 5-year supply of housing land,
  - responds to the new national policy context established by the National Planning Policy Framework (NPPF) (published in March 2012), and
  - accords with the requirements of the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and associated Regulations.
17. There has been a great deal of preparatory work for the new plan, including consultations on Issues and Options (July – September 2012) and on Issues and Options 2 (January – February 2013). A collection of evidence documents has been prepared, including a number of specialist studies, to justify and underpin the preparation of policies. All of the 30,000 representations made during the two periods of Issues and Options consultation were taken into account and greatly assisted in preparing the ‘draft plan’ which was agreed by the Portfolio Holder on 11 June 2013, and subsequently by the on Cabinet 27 June 2013.
18. This ‘draft plan’ was also consulted upon for a period of 12 weeks between 19 July and 14 October 2013. In plan-making terms, this consultation stage was known as the ‘Proposed Submission’ stage. This means the Council considered, subject to the outcome of the consultation, that the plan was ‘sound’ and should be independently tested in its present form through the examination process prior to adoption.

### **Results of Consultation on Proposed Submission Local Plan (Summer 2013)**

19. The Council received 7,385 separate representations (made by 3,369 respondents) to the Proposed Submission Local Plan consultation (July to October 2013). Of these, 2,270 were supporting and 5,115 were objecting to aspects of the plan. The comments received generally reflect the comments made during the earlier two rounds of Issues and Options consultation and have therefore already been taken into account by the Council in preparing the draft plan. Nevertheless, it is the responsibility of the Council to ensure that it has properly considered the representations received on the Proposed Submission Local Plan and to reach a considered view whether the plan is ready to submit for examination.

20. It is a regulatory requirement to publicise a summary of the main issues raised during a Proposed Submission consultation exercise such as the one undertaken in summer 2013. Whilst it is not a requirement to provide an assessment or response to the representations received, the Council has been clear that it still wanted to hear the views of anyone with an interest in the plan during the consultation and would consider the views received when deciding whether the plan is ready to submit for examination. This assessment and a Key Issues and Assessment schedule is attached at Appendix C, which covers all policies in the plan.
21. The Key Issues and Assessment schedule does not attempt to summarise every detailed point made in representations. It is a guide to highlight the main points made to the plan, sustainability appraisal or policies map that are relevant at this stage, to help Members form a view on whether the plan is ready to submit for examination. All representations received are available to view on the Council's consultation website at <http://scambsjdi-consult.net/ldf/>. The Inspector will have all representations in full.
22. The schedule forms part of the audit trail that has been created throughout the plan making stages. The published audit trail up to the Proposed Submission Local Plan 2013 forms Annex A to the Sustainability Appraisal, and also forms part of the Statement of Consultation. The Key Issues and Assessment schedule is bound separately for Members' convenience but will be incorporated into the existing audit trail for submission to provide a full record of the process leading to the policies and proposals included in the Local Plan submitted for examination. The audit trail that accompanied the Proposed Submission Local Plan for consultation can be viewed on the Council's website at [https://www.scambsgov.uk/sites/www.scambsgov.uk/files/documents/Audit Trails Chapters 2-10.pdf](https://www.scambsgov.uk/sites/www.scambsgov.uk/files/documents/Audit%20Trails%20Chapters%202-10.pdf).
23. This report includes the follow documents:
- Schedule of Proposed Major Modifications to the plan – see Appendix A
  - Schedule of Proposed Minor Changes to the plan – see Appendix B
  - Key Issues and Assessment – see Appendix C
  - Statement of Consultation Update – see Appendix D
  - Duty to Cooperate Statement Update – see Appendix E
24. (Note: Appendices A, B and C are attached to printed copies of the agenda. All appendices are available on the website. Members can request hard copies of other appendices from the Planning Policy Team at [ldf@scambsgov.uk](mailto:ldf@scambsgov.uk) or 01954 713183, including those below).
25. A number of updates to the evidence base are also required to support the Local Plan at submission. These are:
- Great and Little Abington Parish Councils' Proposals – including leaflet providing information on the Parish Councils' proposals and results of consultation with the local community and key stakeholders - Appendix F.
  - Graveley Parish Council Proposals – leaflet providing information on the Parish Council's proposals - Appendix G. NOTE: Results of current consultation with the local community and key stakeholders will be report to Council meeting to confirm whether there is local support such that a change could be proposed to the Local Plan.

- Sawston Transport Modelling – report on technical assessment of the traffic impacts of the proposed housing allocations in Sawston undertaken in response to representations - Appendix H.
- Development Frameworks evidence paper update – an additional table assessing new framework changes put forward in representations is contained at Appendix I.
- Sustainability Appraisal – update for Parish Council led proposals for The Abingtons to address proposed major modifications – Appendix J.
- Habitats Regulations Assessment update – Appendix K (to follow).
- Cambourne Retail and Employment Study – explores retail and employment development in the village and opportunities to support future development – Appendix L.
- Strategic Spatial Priorities: Addressing the Duty to Co-operate across Cambridgeshire & Peterborough (January 2014) – supplements the Cambridgeshire & Peterborough Memorandum of Co-operation: Supporting the Spatial Approach 2011-2031 (May 2013) – Appendix M.
- Services and Facilities Study Update – once finalised.
- Transport Strategy for Cambridge and South Cambridgeshire – to be considered by the County Council’s Cabinet for agreement on 4 March.
- Transport Strategy for Cambridge and South Cambridgeshire – the final version following public consultation will be considered by the Joint Strategic Transport and Spatial Planning Group at its meeting on 6 February and will be put to the County Council’s Cabinet for agreement on 4 March.
- Services and Facilities Study Update – consultation with Parish Councils on draft updated study underway. This is a factual report and the updated version will be included in the evidence base supporting the submitted Local Plan.

### **Key Issues and Assessment**

26. A high level summary of the main issues raised in representations and a summary of the assessment is as follows:

- **THE PLAN MAKING PROCESS**

**Main Issues:**

- Concerns that the Council had not followed appropriate plan making processes, including that:
  - the consultation process was confusing, including changing documents during consultation.
  - after Issues & Options 1 the Council announced that Bourn Airfield would not be pursued as a development site but was reintroduced into the Local Plan at the Proposed Submission stage without further consultation which is undemocratic, unsound and possibly illegal.
  - Council did not put final plan to committee, only portfolio holders decided, other councillors were issued with fait accompli that did not accord with views expressed in workshops that were not open to public scrutiny
- Must be complete transparency throughout the consultation period and during the period of presentation of the plan to the Inspector.
- The Council isn’t listening.
- Consultation Form long and complicated, not in plain English, and designed to discourage members of the public from submitting views.

### **Assessment:**

- All the required processes for producing a local plan have been followed in an appropriate and transparent way. The first round of consultation included development site options and some new sites were put forward in representations. Some of these were included as additional site options in a second Issues & Options consultation. The Council made it very clear in a variety of ways, including magazine articles and letters to representors, that the Issues and Options 2 consultation did not in any way indicate decision by the Council on any of the site options consulted on the first Issues and Options consultation. The additional sites were adding to the options already consulted on. No decisions or announcements were made on the Council's consideration of either Issues & Options Consultations until after the Portfolio Holder considered a report on both consultations on 11 June 2013.
  - The 'changes made to documentation during consultation' referred to in representations relates to the Strategic Housing Land Availability Assessment (SHLAA), including in particular the evidence base for Bourn Airfield. The version of the SHLAA issued at the start of the consultation did not include all of the most up-to-date information. However, all the latest information – such as how many homes could be built on the proposed sites – was used when compiling the Plan, but some of the data did not get transferred into the version of the SHLAA published at the beginning of the consultation. This oversight was identified early in the consultation, and the evidence document was updated and re-published. To ensure that no one would be disadvantaged, the end of the consultation period was extended by 2 weeks from 30 September until 14 October 2013 to compensate and ensure a full six-week consultation period from the date of re-publication, as required by regulations. Those parties who had been notified about the public consultation were again notified.
  - Being a listening Council is one of the Council's three aims. Listening to its residents and stakeholder does not mean that the Council will be able to agree with everyone. During the preparation of the new Local Plan, the Council has listened to views from across the whole of South Cambridgeshire which for example sent a very clear message that development should not be spread across all villages but should be focused into larger villages, new villages or new towns.
  - The Council used a representation form based on the Model Representation Form produced jointly by the Planning Advisory Service (PAS) and the Planning Inspectorate (PINS). This form was subsequently revised to request the necessary information in a simplified format. In response to concerns raised by some parish councils and residents, the Council further refined the representation form in consultation with some local representatives and agreed the final version with them with the aim of making a necessarily formal process as accessible as possible.
- **DUTY TO COOPERATE**

### **Main Issues:**

- Hertfordshire County Council has concerns about the wider transport implications of development proposals within the local plan

- Central Bedfordshire Council although with no specific objection mentions the potential unmet housing need within its district being met by South Cambridgeshire Council.
- Cambridge South promoters say that cooperation has not been effective and strategy will not result in sustainable development.
- Bourn Parish Council and Histon and Impington Village Action Group concerned that cooperation wasn't sufficient.

**Assessment:**

- South Cambridgeshire Council has worked with its neighbours throughout the plan making process. All of the Council's 'duty to co-operate partners' including Central Bedfordshire Council, Hertfordshire County Council and all parish councils within and adjoining the district were formally contacted at the outset of the plan making process and all consultation stages. Until the Proposed Submission stage of consultation South Cambridgeshire Council had not received any concerns from any of these 'duty to co-operate' partners about the fulfilling this requirement.
- The Council does not consider that the points made by Central Bedfordshire Council and Hertfordshire County Council can reasonably be substantiated as a failure to comply with the duty to cooperate and correspondence is ongoing with those councils to seek agreement that they are not pursued as objections under the duty.
- There has been full and comprehensive co-operation with partners and the public consultations undertaken have been both consistent with the Council's approved Statement of Consultation and regulations whilst going beyond those requirements.

● **HOW MUCH DEVELOPMENT?**

**Main Issues:**

- The targets for number of jobs and homes in the plan should be both higher and lower.
- Particular developer pressure for higher housing target with alternative targets ranging from 21,500 to 25,300 homes.
- The SHMA approach is challenged.
- South Cambridgeshire should provide some of Fenland and East Cambridgeshire's needs rather than Peterborough.
- The buffer for 5-year housing land supply should be 20% due to historic under delivery (not 5%).

**Assessment:**

- The Council has worked closely with all councils in the Cambridge Sub Region Housing Market Area (HMA) to prepare a Strategic Housing Market Assessment (SHMA) that identifies the objectively assessed needs for jobs and homes in the area and for each district. The SHMA is considered to provide an appropriate and robust assessment of housing needs.
- Both the Council and Cambridge City Council have committed to meeting in full the housing requirement identified for their areas in the SHMA. The NPPF



requires the plan to fully meet the objectively assessed needs for South Cambridgeshire unless it cannot do so.

- The Memorandum of Co-operation between the Cambridge HMA authorities and Peterborough City Council demonstrates that the whole of the objectively assessed housing needs identified in the SHMA will be met, with a small part of Fenland and East Cambridgeshire's needs being met in Peterborough, in the already adopted Peterborough Core Strategy.
- The plan includes a buffer of 5% to its 5-year housing land supply as required by the NPPF. The NPPF requires a 20% buffer to be provided if there is evidence of persistent under delivery in an area. The Council does not consider this applies to South Cambridgeshire. Any under delivery in individual years reflects the economic cycle.

- **WHERE SHOULD IT GO?**

**Main Issues:**

- The Cambridge area should have more development on the edge of Cambridge with a review of the Green Belt, which would provide a more sustainable pattern of development.
- There should not be any Green Belt releases on the edge of Cambridge or at villages and exceptional circumstances do not exist to review the Green Belt because alternatives exist.
- New settlements are the right approach.
- Development at Bourn Airfield and Cambourne West is unsustainable
- Both more or less development in villages.
- Need for sustainable development, reducing commuting and delivering transport infrastructure.
- Transport strategy has been led by planning strategy rather than the other way round.
- A number of detailed changes are sought to village frameworks.
- Detailed objections on the settlement hierarchy and which category individual villages are in, including from Comberton, Girton and Bassingbourn Parish Councils saying that they should not be elevated to Minor Rural Centres although recognising they are better served than other Group villages.

**Assessment:**

- The evidence base for the plan tested the sustainable development strategy and confirmed that land in and on the edge of Cambridge remains the most sustainable location for development, with best accessibility to services and facilities. An Inner Green Belt Study was prepared jointly with Cambridge City Council that identified a few limited locations where further releases of land from the Green Belt, in addition to the major releases made in adopted plans, could be made without fundamental harm to Green Belt purposes.
- Any further large scale releases as sought in objections to the north east, south east, south and west of Cambridge or further more modest releases in north west Cambridge would cause significant harm. Government attaches great importance to Green Belts and sets out strong policy guidance for them in the NPPF. They can only be reviewed when local plans are prepared and where there are exceptional circumstances. Considerations should include the impacts on sustainable development. The sustainability appraisal and

planning assessment considered the balance of harm and concluded that the Green Belt should remain as designated, apart from the limited releases identified in the boundary review, which are allocated in the Cambridge and South Cambridgeshire Local Plans for either housing or employment development.

- The relative merits of a new settlement focused strategy and dispersed village development were compared and new settlements identified as having far greater sustainability benefits, including the ability to provide the services, facilities and infrastructure needed to support new development through the focus of development in limited locations and a higher share of journeys by public transport. This approach was supported through the consultations at the issues and options stages.
- A high volume of representations received that showed there are concerns about either approach to the development strategy. There are concerns about development on the edge of Cambridge (a petition of 2,200 plus signatures) to be weighed against objections to the proposed new settlements (1800 plus objections to Bourn Airfield new village and 400 plus objections to Waterbeach new town). The transport implications of the various strategy options were tested during the plan making process through transport modelling and this informed the preferred strategy in the Proposed Submission Local Plan. The Transport Strategy for Cambridge and South Cambridgeshire was prepared alongside the Local Plan process and appropriately reflects the development strategy included in the two Local Plans.
- The village framework boundary changes sought have been considered and no changes are considered necessary to the plan.
- The Village Classification report supporting the Local Plan showed five settlements (Bassingbourn, Comberton, Girton, Milton and Swavesey) previously in the Group Village category as standing out above existing Group villages, particularly due to the presence of employment, public transport, secondary education or proximity to Cambridge. They also performed better than some existing Minor Rural Centres. Rather than creating an additional category of village, these have been included as Minor Rural Centres. This prevents the hierarchy becoming too complex. The performance of the five villages against a consistent set of factors justifies their higher position in the Hierarchy and no changes are appropriate.

- **WHEN IS IT NEEDED?**

**Main Issues:**

- Some developers say the housing trajectory (delivery programme) is too optimistic generally.
- Promoters of Waterbeach and Bourn Airfield new settlements say they can, and should be able to, come forward earlier than in the plan.
- Others say estimates for delivery from those sites by 2031 are too high.
- HCA supports emphasis on Northstowe delivery getting under way before other new settlements come forward.
- Some objection to assumptions of how much of Northstowe will be delivered in the plan period.

### **Assessment:**

- The plan takes a robust approach to the housing trajectory that aims to be both robust and flexible. The plan allocates the full housing target and makes sensible assumptions on delivery, made in consultation with the promoters of sites. For Northstowe, the promoters assume that once Northstowe is up and running it will deliver 500 homes per year on average throughout the rest of the plan period. The Council has taken a precautionary approach and assumed maximum delivery of 400 homes per annum, although there are no limitations on it coming forward faster.
- The timescales assumed for Waterbeach and Bourn Airfield take account of the Council's experience of delivering new settlements and are considered to be realistic. This is also part of a strategy to ensure that the new settlements do not all try to deliver at once which might slow delivery overall. Once started, these sites need to deliver the necessary services and facilities on site and supporting infrastructure quickly, especially transport, to ensure that they become sustainable developments at an early stage. The plan allows for both Waterbeach and Bourn Airfield to come forward earlier if needed to ensure a 5-year housing land supply and builds in further flexibility. The HCA support for the phasing of the two additional new settlements is consistent with the Council's view.

### **• STRATEGIC SITES IN THE PLAN**

#### **Main Issues:**

- The promoters broadly support all the sites in the plan, but NIAB3, and Waterbeach new town want slightly larger sites and Cambourne West want a much larger site. Bourn Airfield new village promoters want the major development area designation removed, leaving the Area Action Plan boundary, and the built area would be resolved at later planning stages.
- Objections to safeguarding of Cambridge Airport as is not available for development and cannot be relied upon, and that land north of Newmarket Road and north of Cherry Hinton should not be developed for housing.
- Promoter of an area of land at Cambridge Northern Fringe East seeks inclusion of residential uses.
- The two new settlement promoters want to start earlier than set out in the plan (which is 2022-23 for Bourn Airfield and 2026-27 for Waterbeach).
- Large number of objections made to the three new strategic sites:
  - Waterbeach (42 support, 431 objections)
  - Bourn Airfield (22 support, 1,835 objections)
  - Cambourne West (18 support, 548 objections)
- Concerns raised include issues such as landscape, traffic, impact on local communities, viability and deliverability.
- Also poor access to jobs (BA/CW), flood risk (WB), impact on Denny Abbey (WB), railway station moving from the village (WB) and would prefer a smaller development (WB).

#### **Assessment:**

- **NIAB3** – the site reflects the land identified in the Inner Green Belt study review as capable of being removed from the Green Belt without significant harm to Green Belt purposes. Land to the south west of the A14 Histon junction fulfils important Green Belt purposes and should be retained as an

undeveloped green break between Cambridge and Impington to provide effective visual separation.

- **Cambridge East** – the adopted Cambridge East Area Action Plan is being retained and provides a framework for bringing forward development north of Newmarket Road (where an application has now been submitted) and north of Cherry Hinton. The land was identified as not significant to Green Belt purposes and no compelling reasons to change the boundary have been put forward. Safeguarding the land recognises the sustainable location of the site at the top of the search sequence but does not rely on it. It is safeguarded so that if it becomes available in the future beyond the plan period it can be considered through a future review of the plan. Marshall supports the safeguarding of the land.
- **Cambridge Northern Fringe East** – Large areas of previously developed land are available for development on the northern fringe of Cambridge including land in Cambridge and South Cambridgeshire. Carried forward from the adopted plan, it is located close to the Cambridge Science Park and the A14, the site will soon also have access to a new Science Park railway station. The site is important for employment uses. The inclusion of a significant residential component would be inappropriate given the site's separation from other residential communities, schools, shops and services, and the unavoidable constraints imposed by odour from the water recycling centre, railway noise, and from the operation of minerals railheads and associated uses. The site will be considered further through the proposed Area Action Plan (AAP).
- **Waterbeach:–**
  - A new town north of Waterbeach is a key part of a sustainable development strategy for the wider Cambridge area.
  - It can include an element of self containment and high quality services and facilities to provide for the needs of its residents, alongside the opportunity to provide high quality sustainable transport links to Cambridge. The proposed AAP is the appropriate mechanism for addressing in more detail: the way that the new town will come forward, its dwelling capacity, the northern boundary of built development having regard to the setting of Denny Abbey, access to the Abbey and Museum, education, the location of the new station and its accessibility, mitigation of impacts on the existing village, ecology and biodiversity, and the relationship of the new town to key external green infrastructure such as the river and Wicken Fen.
  - Regarding viability, the development will generate significant value over a period extending well beyond 2031 but will also require significant infrastructure expenditure over the same period. A Section 106 agreement will be required from the developer, together with significant external funding, which would include City Deal if that were to be agreed.
  - Regarding traffic and transport the County Council Transport Strategy for Cambridge and South Cambridgeshire demonstrates that appropriate solutions to the transport impacts of the new town exist. These will be further developed in the AAP. The location of the new railway station will also be agreed as part of the Area Action Plan. A location close to the existing village will be sought to best serve the existing village, and for parts of it the location will be closer than the existing station.
  - Consideration was given to the merits of a smaller scale of development on the site during the Issues and Options stage of plan making. It was not

included in the Local Plan given the greater benefits of a larger scale of development.

○ **Bourn Airfield:–**

- A range of alternative sites and development strategies were considered through the plan making process, and on balance the opportunities provided by Bourn Airfield, in combination with other developments on the A428 corridor, was identified as an appropriate element of the strategy for the wider Cambridge area. A new village at Bourn Airfield provides an opportunity to provide for sustainable development, with an element of self-containment and high quality services and facilities to provide for the needs of its residents.
- It is recognised that the new village will provide for the development needs of the District and there will also be residents travelling to jobs and services elsewhere. Together with Cambourne, Bourn Airfield gives the opportunity to develop high quality sustainable transport links to Cambridge.
- Whilst the site has been rejected previously when better sites were available, sites must be considered on their merits and their potential to meet the needs of the District at the time of the plan review. The results of the plan making process now demonstrate that it should form part of the strategy for the wider Cambridge area.
- Capacity of the site was explored in the SHLAA, and there is capacity to accommodate the scale of development anticipated. Average net densities across the site within a range of 30dph to 40dph have been explored. The August 2013 SHLAA technical assessment demonstrates that a capacity of 3,500 homes can be achieved at a density of between 30 dph and 35 dph. The promoter's alternative land budget methodology confirms that densities will be in this vicinity on average across the site as a whole. The actual capacity at Bourn Airfield will be arrived at following a design led approach and confirmed in the required AAP.
- Viability has been explored in evidence prepared to accompany the plan. The biggest issue for this site (and others) is likely to be the delivery of transport infrastructure. As well as the value generated by the development, there are other sources of funding that will help deliver the development strategy, in particular the City Deal if approved.
- The transport impacts of this site and the Local Plan have been explored through transport modelling. A range of transport measures are detailed in the Transport Strategy for Cambridge and South Cambridgeshire, produced by the County Council to accompany the plans. This includes significant public transport improvements along the A428 corridor. There are a number of options for addressing bus priority on the A1303. The arrangement of Cambourne West and Bourn airfield, in combination with the existing Cambourne site will provide a particular opportunity to deliver a high quality public transport route.

○ **Cambourne West:-**

- A range of alternative sites and development strategies were considered through the plan making process, and on balance the opportunities provided by Cambourne West, in combination with other developments on the A428 corridor, is an appropriate part of the strategy for the wider Cambridge area.
- The development of a fourth linked village to the west of Cambourne would be a key part of a sustainable development strategy for the wider Cambridge area. It provides an opportunity to provide for sustainable

development, with an element of self-containment and high quality services and facilities to provide for the needs of its residents.

- It is recognised that the new village will provide for the development needs of the District and there will also be residents travelling to jobs and services elsewhere. It will also give the opportunity to provide high quality sustainable proposed transport links to Cambridge.
- Currently the site indents around the Swansley Wood Farm house and buildings. A representation now confirms that the land is available for development, and seeks its inclusion within the plan. As a logical rounding off of the site, that simply incorporates existing built uses, a minor change is proposed to include this land within the site boundary.
- The transport impacts of this site and the Local Plan have been explored through transport modelling. A range of transport measures are detailed in the Transport Strategy for Cambridge and South Cambridgeshire, produced by the County Council to accompany the plans. This includes significant public transport improvements along the A428 corridor. There are a number of options for addressing bus priority on the A1303. The arrangement of Cambourne West and Bourn airfield, in combination with the existing Cambourne site will provide a particular opportunity to deliver a high quality public transport route.
- Governance of the site has been raised as an issue by Parish Councils. The site falls primarily in the Caxton Parish, and partly in the Cambourne Parish. Like other recent major developments, arrangements for future governance of the new settlement would need to be considered as the site is progressed in close consultation with the Parish Councils, in parallel with the planning process but separate from it. It is an important issue for the implementation of the site but this is not a matter for the Local Plan. However, a minor change to the supporting text is proposed to clarify that the majority of the site falls within Caxton Parish.
- A larger site extending all the way to the A1198 and Caxton Gibbet roundabout as sought in objections was considered through the plan making process but rejected. This was to address wider landscape impacts and reflects the topography of the site. The boundary will ensure that the fourth linked village is of a scale that relates well to the three other villages of Cambourne, and it also ensures that it will sit comfortably in its setting and retains a green foreground and long views across the open area which will remain to the west of Cambourne between the A1198 and A428.

- **STRATEGIC SITES NOT IN THE PLAN**

**Main Issues:**

- The promoters of a number of other strategic sites seek inclusion of their sites in the plan:

Sites on the edge of Cambridge:

- Cambridge South – 1,250 homes and a new Science Park (85,000sqm, which is about 2/3 size of the existing Cambridge Science Park)
- Cambridge South East – 3,000 to 4,000 homes and 10ha employment
- Trumpington Meadows and Abbey Stadium (in Cambridge) – community football stadium, indoor and outdoor sporting facilities and residential development (note: phrased to leave open what uses go on which site and how much housing proposed)
- Barton Road North – 1,500 homes

- Barton Road South – removed from Green Belt and safeguarded for longer term development
- Land around Fen Ditton – for housing (note: number not specified but in the order of 400 to 500 homes) and area of search for a secondary school north of High Ditch Road (see also County comment at successful communities).

New settlements or expansion of existing new settlements:

- Northstowe – Extension to the north of the Guided Busway for employment led development and 1,800 homes.
- Land north of Cambourne – expansion of Cambourne for 3,600 homes with associated uses

Note: No representations received at this stage promoting Hanley Grange or Six Mile Bottom new settlements.

- **Assessment:** All the strategic objections sites were put forward at the beginning of the plan making process and have been considered through the Strategic Housing Land Availability Assessment (SHLAA) and the sustainability appraisal. They were also considered as part of the development of the strategy and the merits of locating development on the edge of Cambridge through Green Belt releases or focusing development in new settlements or villages. Looking at each stage in the development sequence:
  - The objections that seek major releases of land from the Green Belt were shown in the Inner Green Belt Study Review to cause significant harm to Green Belt purposes. The locational benefits of the edge of Cambridge were recognised as part of the process of deciding the development strategy and the focus on new settlements. No compelling circumstances have been put forward to change the plan to release these sites from the Green Belt, including the proposals for significant employment development or a secondary school.
  - The objection site seeking extension of Northstowe to the north would be separated from Northstowe by the Guided Busway and have significant negative impacts on landscape character incapable of effective mitigation. The objection site north of the A428 that is promoted as an extension to Cambourne would not form a logical extension to Cambourne given the severance caused by the A428 and St. Neots Road and the development would have significant negative impacts on landscape character incapable of effective mitigation.

- **VILLAGE HOUSING SITES IN THE PLAN**

- **Sawston –**

**Main Issues:**

- Dales Manor (44 Support, 102 Object):– promoters say capacity could increase from 200 to 230 homes
- North of Babraham Road (10 Support, 207 Object) - promoters did not make a representation but have since confirmed that they support the allocation
- South of Babraham Road (14 Support, 224 Object) – site is in three ownerships. All support their sites, although two did not make representations. The middle owner, Ward’s Charity, did not make a

representation but now says it is opposed to access being taken across its land to the remainder of the site to the south.

Total of 532 objections across the 3 sites including from Sawston Parish Council and seven nearby Parish Councils on grounds including Green Belt, traffic and access to services and facilities.

Note: no representations have been received from Cambridge City FC for inclusion of a Sawston Football Stadium in the plan. They have gone for an application instead. One individual has proposed allocating the site.

**Assessment:**

- Sawston is one of the largest and most sustainable villages in the District and is located south of Cambridge close to a number of successful business and science parks. It is a suitable location for housing development. The sites were identified as having development potential for housing development through the SHLAA and SA processes and included in the Proposed Submission Local Plan as some of the better site options to meet the development strategy.
- A key concern raised in representations is traffic impacts of the three sites and a transport assessment for Sawston has been carried out to test the traffic objections to the proposed housing sites and the main junctions in the vicinity. Overall the assessment confirms that while there will be impacts, a number of potential mitigation measures are considered to be feasible to help reduce the impacts of development. Changes to the timing of the signal controlled junction at Babraham Road/Cambridge Road to effectively provide capacity for both vehicular and pedestrian movements may be needed.
- Education impacts are capable of mitigation and policies of the plan will ensure that additional school capacity is provided in a suitable way and when it is needed.
- Sawston has a good range of shops and services and buses to Cambridge every 20 minutes at peak times. Two of the sites are on the edge of the village and as one of the largest villages in South Cambridgeshire are therefore inevitably some way from the village centre. However, the facilities available locally are amongst the best in the district and it is preferable to locate development here rather than at smaller villages where village edge sites would be closer to the village centre but one with far fewer facilities, meaning that residents would have to travel from a smaller village to somewhere like Sawston to access facilities. The village centre and bus stops are within easy walking and cycling distance of the development sites for most people being generally within 1 kilometre (0.6 miles), which is around a 10-12 minute walk.
- The Ward's Charity (a promoter of the middle part of the site south of Babraham Road) has stated in a letter received after the close of the consultation that: 'As trustees we intend our land to remain in the SHLAA process. However we plan to retain control over access to the southwest of our land (to the remaining portion of site H1/c). In reaching this view we have been mindful of strong opposition to the scale of proposed development in Sawston. We are a charity associated with the parish church and it is clearly not our wish to alienate our parish community'. Nevertheless, the site is suitable for housing development and remains one of the best village sites available to meet needs and provide an element of housing in the south of the district and close to existing business parks. It is considered that there must be a reasonable prospect



that the whole site will become available for development as the plan proposes from 2020/21, especially as the policy requires that the site should come forward as a single proposal in a comprehensive scheme. On this basis it should be retained as a proposed site allocation in the Local Plan. Development limited to the Charity owned land immediately south of Babraham Road would form an isolated promontory of development and would sterilise the development potential of the remainder of the site to the south and so would not be acceptable.

○ **Histon & Impington –**

**Main Issues:**

- the promoters seek a larger site. 2 supports, 22 objections (including the Parish Council) including loss of Green Belt, rural character and heritage, transport, school capacity and flood risk.

**Assessment:**

- Histon and Impington is together one of the largest and most sustainable villages in the District and located just to the north of Cambridge. It is a suitable location for housing development.
- The impact on Green Belt purposes and landscape were taken into account through the SHLAA and SA processes and a suitable site included in the plan to mitigate impacts on Green Belt purposes, heritage assets, local townscape and landscape. Part of a larger site would be at risk of flooding.
- The site lies adjacent to a recently completed housing development and the Local Plan site would round off and not extend development further north than the recently completed development.

○ **Melbourn –**

**Main Issues:**

- 179 supports, 51 objections including lack of medical and school capacity and traffic congestion.

**Assessment:**

- Melbourn is one of the larger and more sustainable villages in the District. It is a suitable location for housing development and forms one of the better site options to meet the development strategy.
- The site is separated from New Road by a recently completed rural affordable housing exception site, whilst to the south it is largely shielded from views by a shelter belt of trees and by hedges. Site access will primarily be via an existing access road (Victoria Way), which serves the affordable housing and the village cemetery.
- The site has attracted a majority of local support.

○ **Gamlingay –**

**Main Issues:**

- 4 support, 9 objection. Transport concerns, also that existing employment uses need to be retained or relocated, including from the Parish Council. Promoters support principle but not level of employment;

**Assessment:**

- Gamlingay is one of the larger and more sustainable villages in the District. It is a suitable location for housing development and forms one of the better site options to meet the development strategy.
- The site currently provides a significant number of local jobs in an area of the district relatively distant from major centres of employment and it is appropriate that it should continue to provide some employment alongside much needed housing.

○ **Willingham –**

**Main Issues:**

- 4 support including Anglian Water, 1 objection from Ely Group of Internal Drainage Boards seeking surface water run-off to be at existing rates.

**Assessment:**

- Willingham is one of the larger and more sustainable villages in the District. It is a suitable location for housing development and forms one of the better site options to meet the development strategy.

○ **Comberton –**

**Main Issues:**

- 2 support, 30 objection including loss of Green Belt and traffic congestion. Some objectors would support a lower number of homes (50-60). Toft Parish Council has considerable concerns re football pitch and changing facilities as not discussed with them. Comberton Parish Council objects on traffic and sewage grounds, lack of local support and financial benefits to Toft for development on edge of Comberton. Promoter seeks clarification of justification for proposed football pitch and car park and seeks a larger site.

**Assessment:**

- Comberton is one of the larger and more sustainable villages in the District. It is a suitable location for housing development and forms one of the better site options to meet the development strategy.
- Restricting built development to the east of the existing access road is important to restrict the impact of the development on the landscape and to maintain the existing separation from Toft. The access road is almost opposite the western boundary of the Village College and built development west of the access road would extend the village rather than round it off opposite the school.
- The part of the site to the west of the access road is also the most suitable to accommodate sustainable drainage systems features to mitigate surface water drainage and flood risk impacts.

- The development site should not extend further to the north, which would breach the natural line of the village and have a greater impact on townscape and landscape.
- The policy provisions for a football pitch and facilities and Village College parking were included in the plan having been proposed to us by the landowner in 2012 following what they described as their own 'detailed consultations' with Comberton and Toft PC's and the Village College. The views of both Parish Councils were sought by the Council at that time but without reply. Both Parish Councils have now objected to the proposal and Toft PC have stated that the proposed football facilities are of concern to them. The Village College has not made representations on the community car parking. The landowner has proposed that the policy be made more flexible to allow provision for football, and VC parking, either on site or off-site (by way of financial contributions) and that parking provision only be made in response to an identified need. A minor change is proposed to the supporting text of the policy to clarify the status of the development requirements to address the concerns of the landowner and Parish Councils.

- **PARISH COUNCIL PROPOSALS**

**Main Issues:**

- Great and Little Abington Parish Councils seek 3 sites to be allocated for housing led development, 2 of which are outside the framework, to be allocated for a total of 53 homes
- Graveley Parish Council seeks allocation of housing on 1 site outside framework for 10-12 homes.

**Assessment:**

The Abingtons

- The Parish Councils of Great and Little Abington have promoted three small scale housing developments to meet identified local housing needs, primarily for market housing but also including some affordable homes. The objective being to allow for some natural growth and to allow older households to 'downsize' to smaller properties in the same village.
- The Parish Council, as an alternative to taking forward a Neighbourhood Plan, consulted local people and key stakeholders by leaflet between October and December 2013 about whether the sites should or should not be allocated for housing development. 189 completed leaflets were returned with clear local support for all three sites, ranging from 72% to 86%.
- Background material, including scans of the consultation leaflet, the completed leaflets and of the report of consultation have been submitted to the Council and have been added to the evidence base supporting the Local Plan.
- In the light of this clear evidence of local support for the proposals demonstrated in the consultation, which puts the proposals on a similar footing to other proposals in the Local Plan, it is proposed that as an alternative to preparing a neighbourhood plan, that major modifications (supported by the public consultation already carried out) be made to the

Local Plan to allocate the sites for housing development to meet local needs. Development should seek to fulfil the Parish Council aspirations for each site.

- Part of one of the housing sites is shown as Local Green Space in the Proposed Submission Local Plan. A consequential major modification is proposed to delete the housing site from the Local Green Space.

#### Graveley:

- Graveley Parish Council is promoting two small scale housing developments to meet identified local housing needs, primarily for market housing but also including some affordable homes. The objective is to allow for some natural growth, allow older households to 'downsize' to smaller properties in the same village, and to secure a new public green area for the benefit of the village.
- At the time of writing, the Parish Council, as an alternative to taking forward a Neighbourhood Plan, is consulting local people by leaflet about whether the sites should or should not be allocated for housing development. The consultation will close on 16 February 2014. The outcome of the consultation will be reported to the special Council meeting on 13 March. A recommendation to Council regarding the inclusion of the sites in the Local Plan will depend upon the outcome of the village consultation and whether there is clear evidence of local support.

### ● **VILLAGE SITES NOT IN THE PLAN**

#### **Main Issues:**

- The promoters of 90 sites seek inclusion of their sites in the plan.
- Most sites were previously put forward as SHLAA sites.
- 17 are entirely new sites.
- 5 of the new sites are in larger villages: Cambourne (Great Common Farm, The Broadway, which lies south of Upper Cambourne), and sites in Great Shelford, Bassingbourn, Comberton and Gamlingay.

#### **Assessment:**

- The majority of the sites have been considered previously through the SHLAA process and some sites were consulted on as options through the Issues and Options consultations. However, they were all either rejected through the SHLAA process or not considered to provide the best options to form the package of sites included in the draft local plan. None of the promoters of the 5 entirely new sites in larger villages have put forward compelling evidence. The objections do not put forward any evidence that require the SHLAA or the Local Plan to be changed.

### ● **CLIMATE CHANGE**

#### **Main Issues:**

- No justification for 2km distance requirement for turbines.
- Objection to 10% on site renewable energy requirement.
- Developers object to sustainable show homes requirement.
- Amendment sought to renewables policy to ensure flexibility.
- Should rely on national standards and not try to exceed them

**Assessment:**

- The Council's evidence base study confirms that 10% remains an achievable and reasonable target for South Cambridgeshire.
- To protect the amenity of local residents from unacceptable adverse effects, the policy includes the Council's resolution on wind farms as one of the criteria that must be considered in discussions relating to proposals for wind turbines. The policy does allow for a shorter distance to be considered if the applicant can prove that the proposal will not adversely affect local residents.
- Where developers would already be providing a show home, it is reasonable to require them to provide a sustainable show home either in addition to or instead of the show home. The Council has already secured provision of sustainable show homes at Trumpington Meadows and the Cambourne 950 developments and they are working well.
- Policies rely on national standards proposed through changes to Building Regulations for energy conservation. However, it is reasonable for the Council to require further measures to secure additional water efficiency measures as the district lies in an area of water stress. The level of efficiency is set at a level to provide enhancements at a relatively modest cost to the developer.

- **DESIGN**

**Main Issues:**

- Include reference to Building for Life standards
- Add reference to horse riding

**Assessment:**

- Building for Life standard has certain limitations that mean it is not appropriate to rely on as a measure of good design, although is used as an indicator of quality through the Annual Monitoring Report.
- References are proposed to be added to horse riding in various policies as minor changes.

- **PROTECTING AND ENHANCING THE NATURAL AND HISTORIC ENVIRONMENT**

**Main Issues:**

Natural Environment:

- Green Belt:
  - County Council seeks additional wording that says planning permission will only be granted for new development in the Green Belt provided it meets requirements and objectives of NPPF.
- Protected Village Amenity Areas and Local Green Spaces (PVAALGS):

- County Council seeks greater flexibility when considering how existing schools address deficiencies in provision, including re-provision of open space elsewhere on site.
- Objections from landowners to 8 sites proposed for LGS designation.
- 2 new LGS proposed, and
- 2 amendments to LGS proposed.
- Important Countryside Frontages:
  - Objection to 3 ICF
  - 3 new frontages proposed.

#### Historic Environment:

- English Heritage seeks greater clarity on approach to heritage assets and climate change

#### **Assessment:**

- A minor change is proposed to include reference in the supporting text to the strong protection in the NPPF to the Green Belt.
- School playing fields are excluded from Local Green Spaces. In very special circumstances through the planning application process, development could be allowed on PVAA's in order to provide room for expansion of a school if demonstrated to be more important than the value of the individual PVAA.
- No changes to village protection designations, apart from at Little Abington as part of Parish Council-led proposals for housing development.
- The Council recognises the importance of protecting the heritage assets within the district and at the same time allowing appropriate adaptations to respond to the challenges of climate change. The Council considers that the plan provides an appropriate balance to protecting heritage assets, whilst providing for adaptation to climate change.

### • **HOUSING**

#### **Main Issues:**

- All housing:
  - Developers consider the Residential Space Standards are unreasonable and say the HCA standards are not meant for market housing.
  - They say the density policy is too restrictive.
  - The housing mix policy is inflexible and does not reflect need / local circumstances.
- Affordable\_housing:
  - Developers argue that the dwelling threshold should be higher, that there is no case for 40% across the district,
  - Exception sites should either not allow any market housing or alternatively that there should be more flexibility.
- Gypsies and Travellers
  - Gypsy and Traveller Groups argue that more pitches are required to meet local needs and there should have been more discussion with Gypsies and Travellers.
  - They say that policies for Gypsies and Travellers are too complex / unreasonable.

- Views for and against provision at major developments, including views against from some developers.

**Assessment:**

- Residential space standards are intended as a safety net to prevent home sizes declining over the plan period to unacceptable levels. The standards proposed are lower than those being considered by the government for national standards and therefore less restrictive than might become prescribed nationally.
  - The density policy is flexible and allows for a wide variety of local circumstances to be taken into account.
  - The housing mix policy provides an appropriate balance between ensuring a mix of housing in a district where the market would otherwise primarily wish to build larger homes and includes an element of flexibility to take account of local circumstances.
  - A higher threshold would tend to reduce affordable housing provision across the district. The evidence shows that the policy is viable in most locations across the district and the 40% rate has been successfully implemented since 2007. Land values are variable and the most appropriate way to reflect this variability is to allow flexibility in the policy rather than to try to reflect this complexity by different affordable rates across the district.
  - The exceptions site policy for affordable housing provides an appropriate balance between meeting local needs and allowing for very limited market housing if needed to enable exception sites to come forward.
  - The Cambridge Sub Region Gypsy and Traveller Accommodation Needs Assessment 2011 (as amended 2012) provides an appropriate assessment of need, and has been reflected in the proposed target for pitch provision in the District. The Policies proposed in the plan address a range of issues, to ensure sites are appropriate for the location and achieve a suitable quality. Major developments provide an opportunity to assist the delivery of sites should a need arise.
- **BUILDING A STRONG AND COMPETITIVE ECONOMY**

**Main Issues:**

- Employment:
  - Some say that more employment land should be allocated although many support the level of jobs in the plan.
  - Owners of the employment site in Fulbourn Road (adjacent to ARM), Trustees of Wright's Clock Fund, say they are not intending releasing the site and it should be deleted.
  - Babraham Research Park propose extension.
  - Allocation at Spicers Sawston sought.

### **Assessment:**

- The Local Plan identifies a good level of employment land to meet future employment needs and the continued development of the Cambridge high tech clusters. Additional allocations are not needed.
  - The site at Fulbourn Road is capable of development without significant harm to the purposes of the Green Belt. Whilst the landowner has no current intention to dispose of the land, this could change during the plan period and it remains a good site for employment development as an extension to the Peterhouse Technology Park.
  - Babraham Research Park is correctly identified as Green Belt, and future proposals should be considered, as for previous development, in this context.
  - The Spicers Site at Sawston is identified as an Established Employment Area in the Countryside on the policies map, which already provides flexibility for future employment development of the site, and is the appropriate designation for the site.
- Tourism:
    - The National Trust is concerned about how the Council will plan pro-actively to provide tourism based leisure to meet the demands of a growing population if limitations are to be placed on existing sites but no further sites are to be encouraged.

### **Assessment:**

- The Tourism policies support a sustainable scale of development, which supports the continued success of the district's attractions.

## **• PROMOTING SUCCESSFUL COMMUNITIES**

### **Main Issues:**

- Objection that land south of Trumpington Meadows and Abbey Stadium, Newmarket Road should be allocated for community football stadium, indoor and outdoor sports and residential development to fund delivery.
- Support for plan not including a community stadium at Trumpington Meadows.
- Open Space Standards:
  - Sport England (SE) objects to use of standards. Says the Council should assess need to a SE methodology.
  - 4 allocations in the plan objected to.
  - 3 new suggestions for recreation allocations, 2 from parish councils.
- Hospice\_policy - Arthur Rank welcome policy but it fails to recognise need to locate close to acute hospital.
- Household recycling centre - The County Council has highlighted that there remains an outstanding requirement for a Household Recycling Centre in this area.

### **Assessment:**

- The promoters for a community stadium, other sporting facilities and residential development have included sites at Trumpington Meadows and at the Abbey Stadium in Cambridge which would leave open where different facilities would be provided. Whichever site is proposed for a community



stadium, it is not considered that there is a compelling case of need to change the plan.

- The Council has carried out and consulted on a Recreation Study, and the standards are an appropriate way of ensuring open space needs are met. It will continue to work with Sport England and partners to explore strategies to support delivery, to meet the needs of new and existing communities. Allocations are in areas with identified shortages and have the support of Parish Councils.
- The hospice policy goes as far as is appropriate in the plan, without evidence supporting a particular site. The plan cannot imply where exceptions will be made to Green Belt policy. Any proposals will be treated on their merits through the application process.
- An allocation for a Household Recycling Centre (HRC) could not be incorporated into the policy as this is a County matter for consideration in a review of the Cambridgeshire and Peterborough Minerals and Waste Development Plan. The County Council is reviewing its position on HRC provision across the County which may clarify its position.

- **PROMOTING AND DELIVERING SUSTAINABLE TRANSPORT AND INFRASTRUCTURE**

**Main Issues:**

- Growth strategy reliant on significant improvements in public transport and deliverability depends on availability, level and timing of public funding. Large gap in funding and cost. Identify sites less reliant on improvements to ensure deliverability.

**Assessment:**

- The Cambridge and South Cambridgeshire Transport Strategy and Local Plan were prepared in parallel to ensure development is located in sustainable locations and mitigation and infrastructure requirements necessary to promote sustainable travel are included in the Local Plan. Concentrating new development can also help address existing transport conditions, including congestion, by maximising developer funding. It is recognised that the development strategy focus on new settlements will require significant external funding in addition to developer contributions. This would include City Deal if that were to be agreed. This is an expected consequence of the preferred spatial strategy, which concluded that future strategic scale development in the Green Belt on the edge of City would cause significant harm to the purposes of the Cambridge Green Belt. It was also concluded that new settlements are preferable to more dispersed development in the rural area that would not generate the equivalent s106 funding or attract City Deal funding.

**Legal Requirements**

27. If the Council decides the Local Plan is ready to submit, it must ensure that it has undertaken properly all the legal requirements for plan making. The following requirements have all been met:

1. Whether the plan has been prepared in accordance with the **Local Development Scheme** and in compliance with the **Statement of Community Involvement** [[The Planning and Compulsory Purchase Act 2004](#) (The Act) sections 19(1) and 19(3) respectively].
  2. Whether the plan has been subject to a **strategic environment assessment**, and where required an appropriate assessment of impact on any sites falling under the EU Habitat (and Birds) directive [The Act Section 19(5), [EU Directive 2001/42/EC](#), [The Environmental Assessment of Plans and Programmes Regulations 2004](#), [EU Habitats and Birds Directives Directive 92/43/EEC](#), [The Conservation of Habitats and Species Regulations 2010](#)].
  3. Whether the plan is compatible with the requirements of the [EU Water Framework Directive](#) and any River Basin Management Plans prepared under that directive [[Directive 2000/60/EC](#)].
  4. Whether the plan has regard to any **Sustainable Community Strategy (SCS)** for its area; [section 19(2)(f), section 4 of the [Local Government Act 2000](#)].
  5. Whether the plan meets the **procedural requirements involving publicity and availability of the development plan document and related documents**; [The Act Section 20(3), [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#) (The Regulations), in particular the prescribed documents - Reg 17, Consultation - Reg 18, Proposed Submission – Reg 19 and Submission – Reg 22].
  6. Whether the plan meets the **Duty to Cooperate** [The Act Section 33A, The Regulations Reg 4].
  7. Where there are policies applying to sites or areas by reference to an Ordnance Survey map a **Policies Map** is prepared [The Regulations Regs 9(1) & 22(1)].
  8. Whether the plan is consistent with adopted DPDs for the area and whether the plan states how it is intended to supersede any adopted development plan policies [The Act Sections 8(3) & (4) & The Regulations Regs 8(5) & 22(1)(c)].
  9. Whether a **Statement of Consultation** has been prepared [The Act section 20(3) & The Regulations Reg 22(1)(c)]
28. The Council must also ensure that the plan meets the soundness tests as set out in the NPPF (paragraph 182):
- “A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:
- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
  - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”

29. The Council considered the plan to be sound when it agreed the Proposed Submission Local Plan for publication in 2013. However, prior to submitting the plan in the form agreed by Cabinet on 27 June 2013, the Council’s constitution requires the outcome of the consultation that took place between 19 July and 14 October 2013 to be presented to full Council and for full Council to decide whether the plan contains the appropriate strategy, is sound, and is fit for purpose to meet South Cambridgeshire’s needs to 2031. This report is to enable the Portfolio Holder to consider responses to the consultation and decide whether she considers the Local Plan is ready to submit for examination, and if so to make a recommendation to this effect to a special meeting of full Council on 13 March.

### **Options**

30. There are now four options available to the Council for the way forward with the Local Plan. The Council can decide:

- Option 1: to submit the Local Plan for examination without any changes.
- Option 2: to submit the Local Plan for examination with Proposed Minor Changes that help with the clarity of the plan but do not affect its content.
- Option 3: as (b) but to also propose very limited Proposed Major Modifications specifically to incorporate Parish Council proposals that have been produced alongside the Local Plan and where recent local consultation shows clear support for the changes akin to the preparation of a neighbourhood plan.
- Option 4: to make Major Modifications (e.g. reword policies to change their meaning, add new sites or delete existing ones), which would require further public consultation on specific changes before submitting the plan for examination.

31. Looking at each option in turn:

#### **Option 1: Submit the Local Plan for examination without any changes**

32. This option means that, having considered the issues raised during the recent consultation, the Council decides that the plan Cabinet agreed on 27 June 2013 is fit for purpose and does not require any amendments. The plan would then be submitted to the Secretary of State, defended at a public examination and adopted in the form as submitted unless the Planning Inspector who conducts the public examination into the plan recommends otherwise.

#### **Option 2: Submit the Local Plan for examination with Proposed Minor Changes**

33. If, having considered the issues raised during the recent consultation the Council feels the plan as agreed on 27 June 2013 is fit for purpose, but some minor changes could improve the plan’s clarity, then it may follow the procedure set out in option 1 but also submit an additional Schedule of Proposed Minor Changes.

34. A schedule of Proposed Minor Changes can set out changes the council would like to make to the plan, predominantly to address concerns raised during the consultation period or factual updating. The council is not permitted to make these changes

directly to the plan and then submit it. What the Council would be saying to the Inspector is that 'the plan agreed by Cabinet on 27 June 2013 is the plan it wishes to have examined, but the Council thinks the plan can be improved by including the changes as listed in the schedule of Proposed Minor Changes.

**Option 3: As (b) but with Proposed Major Modifications to incorporate Parish Council proposals supported by recent local consultation**

35. It is not normally possible to propose any material changes to the substance of the plan at this stage. However, there are particular circumstances with this plan that mean material changes could be proposed as Major Modifications as part of the ethos of working with Parish Councils. There are specific cases where individual Parish Councils had not been able to complete their local development proposals and local consultation on them in time to be included in the Proposed Submission Local Plan consultation, or in their representations to the consultation. Where such proposals have now been completed and there is evidence provided by the Parish Councils of clear support by their local communities and key stakeholders before the submission plan is considered by Council, such proposals could be included as focused changes to the plan agreed by Cabinet on 27 July 2013.

**Option 4: Make Major Modifications, undertake consultation, then Submit**

36. If, having considered the issues raised during the 19 July to 14 October 2013 consultation, the Council decides it wants to make changes to the substance of the plan before adoption, then it cannot proceed to submit the plan for examination at this stage. Examples of such a change would be the addition or deletion of a site allocation, or a revision to the meaning of a policy of the plan.
37. If the Council decides to make focused changes to a specific part or parts of the plan, that do not change the majority of the plan, then it could carry out an extra consultation on a schedule of Major Modifications, which would form an 'Addendum' to the Proposed Submission Plan. If this option were agreed, a formal consultation of at least 6 weeks would need to be undertaken and any comments received on the Addendum would then be added to those comments received from the 19 July to 14 October 2013. This would mean a delay in submitting the Local Plan to the Secretary of State of at least 6 months and possibly longer if in the light of the new consultation the Council decided that different changes should be considered which would require yet another round of public consultation.

**Next Steps**

38. If the Council decides that the Local Plan is ready to progress to examination, the documents will be submitted to the Government's Planning Inspectorate (PINS), acting on behalf of the Secretary of State. A planning inspector will be appointed to conduct a public examination into the plan, and it is the job of the inspector to take the representations into account during the course of the examination.
39. This inspector will receive plan, the supporting evidence documents and all of the representations received during the 19 July to 14 October 2013 consultation. The Inspector will consider all of this information and decide those issues on which he/she needs more information to determine whether the plan as submitted is sound. The Inspector will programme the examination on the basis of a number of matters and the parties he/she has decided will be invited to make further submissions and appear at the hearings (including in all cases, the Council). If submitted at the end of March, a major part of the examination will be a series of hearing sessions in public.

These hearing sessions are likely to be in the summer/autumn of 2014. Following the hearings, public consultation will be carried out on any major modifications that the Inspector indicates are necessary in order for the plan to be found sound. The Inspector would then produce a Report in which he/she will say if the plan is or is not sound, and legally compliant, with recommended modifications if necessary to make it sound, having regard to the results of any modifications consultation.

40. The Local Plan has been prepared in parallel with the Cambridge Local Plan. Cambridge City Council undertook consultation on its Proposed Submission plan from 19 July to 30 September 2013. The City Council has received almost 3,000 representations to this stage of consultation, including a petition with 2,000 signatures opposing any changes to the Cambridge Green Belt. It has already held two Member meetings assessing those representations. Those meetings have resulted in a recommendation to a meeting of Cambridge City Council on 13 February that the new Cambridge Local Plan is ready for examination with proposed minor changes.
41. If the City Council submits its Local Plan for examination in the Spring, the cooperation in plan-making will continue with a joint examination of the areas of common ground between the South Cambridgeshire and Cambridge Local Plans taking place, with the same Inspector examining and reporting on both plans. The Planning Inspectorate has indicated as much, though this depends whether the two plans are submitted for examination at broadly the same time. Should one be delayed for whatever reason, it is likely that the two plans will be independently examined. As there are joint issues for the councils, it is unlikely that an Inspector's report would be issued on a single plan in isolation.

### **Implications**

42. In the writing of this report, taking into account financial, legal, staffing, risk management, equality and diversity, climate change, community safety and any other key issues, the following implications have been considered:

#### ***Financial***

43. The costs of submitting the Local Plan for examination and subsequent adoption are included in the Council's budget plans.

#### ***Legal***

44. The legal requirements associated with the preparing an up to date Local Plan have been complied with. The independent Inspector will also assess whether the Council has met its legal obligations.

#### ***Staffing***

45. The stages required to complete the local plan process to adoption can be undertaken within current and emerging staffing plan.

#### ***Risk Management***

46. The risks associated with pursuing the Proposed Submission Local Plan through examination in the light of representations received have been considered and the plan is considered sound and capable of adoption. The risks to the Council associated with not delivering an adopted Local Plan as quickly as possible to ensure a 5-year supply of housing land and the long term planning of South Cambridgeshire have also been considered.

### ***Equality and Diversity***

47. An Equalities Impact Assessment has been prepared as Appendix 14 of the Sustainability Appraisal.

### ***Climate Change***

48. The Local Plan includes policies to address the implications of climate change in the determining of planning applications.

### **Consultation responses (including from the Youth Council)**

49. This report considers the responses to consultation on the Proposed Submission Local Plan. Council's specialists in Planning and New Communities, Environmental Health and Housing have been consulted as part of preparing the assessments of representations in Appendix A and their views incorporated. No specific consultation undertaken with the Youth Council, although there has been extensive and wide ranging consultation undertaken on the Local Plan.

### **Effect on Strategic Aims**

#### **Aim 1 - We will listen to and engage with residents, parishes and businesses to ensure that we deliver first class services and value for money.**

50. Consultation provided the opportunity for all stakeholders in the future of South Cambridgeshire to influence the policies and proposals for the new Local Plan before the Council made any decisions. The process specifically included engagement with parish councils at key stages in the process and the plan includes a number of parish council-led proposals.

#### **Aim 2 - We will work with partners to create and sustain opportunities for employment, enterprise and world leading innovation.**

51. The Local Plan responds to forecasts for the growth of the local economy, proposes additional employment sites and includes a more flexible set of planning policies to guide future economic growth while supporting the special nature of employment in the Cambridge area.

#### **Aim 3 - We will make sure that South Cambridgeshire continues to offer an outstanding and sustainable quality of life for our residents.**

52. The Council has a duty to secure sustainable development contained in the NPPF. This lies at the heart of the Local Plan and covers all three aspects of sustainability – economic, social and environment. The Plan has a focus on sustaining and enhancing the qualities of South Cambridgeshire that in national surveys consistently identify the District as one of the best places to live in the UK.

### **Background Papers**

The following documents can be found on the website: [www.scamb.gov.uk/localplan](http://www.scamb.gov.uk/localplan) (unless otherwise stated):

- Proposed Submission Local Plan
- Proposed Submission Policies Map
- Draft Final Sustainability Appraisal
- Evidence base documents - <https://www.scamb.gov.uk/content/evidence-base-and-supporting-studies>
- Strategic Housing Land Availability Assessment (SHLAA)
- Strategic Housing Market Assessment (SHMA)

- Consultation for a football stadium option at Sawston March 2013
- Issues and Options 2 consultation documents January 2013
- Issues and Options consultation documents July 2012
- Localism Act 2011 - [www.legislation.gov.uk/ukpga/2011/20/contents/enacted](http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted)
- National Planning Policy Framework - [www.gov.uk/government/publications/national-planning-policy-framework--2](http://www.gov.uk/government/publications/national-planning-policy-framework--2)
- Agenda papers for Planning Policy and Localism Portfolio Holder meeting 21 March 2013 - <http://scams.moderngov.co.uk/ieListDocuments.aspx?CId=1024&MId=5951&Ver=4>
- Agenda papers for Planning Policy and Localism Portfolio Holder meeting 11 April 2013 - <http://scams.moderngov.co.uk/ieListDocuments.aspx?CId=1024&MId=5952&Ver=4>
- Agenda papers for Planning Policy and Localism Portfolio Holder meeting 11 June 2013 - <http://scams.moderngov.co.uk/ieListDocuments.aspx?CId=1024&MId=6014&Ver=4>
- Agenda papers for Cabinet meeting 27 June 2013 - <http://scams.moderngov.co.uk/ieListDocuments.aspx?CId=293&MId=6036&Ver=4>
- South Cambridgeshire Local Development Framework 2007-2010 – [www.scams.gov.uk/ldf](http://www.scams.gov.uk/ldf)

**Report Author:** Keith Miles – Planning Policy Manager  
Telephone: (01954) 713181