# Planning Policy & Localism Portfolio Holder Meeting 11 February 2014

# South Cambridgeshire Local Plan – Consultation Responses and Consideration on Whether to Submit for Examination

Appendix A: Schedule of Proposed Major Modifications

Appendix B: Schedule of Proposed Minor Changes

**Appendix C: Key Issues and Assessment (Part 1A)** 

Comprising

**Local Plan Chapters 1 to 4** 

#### Appendix A: Schedule of Proposed Major Modifications to the Proposed Submission Local Plan

The schedule outlines the Council's proposed major modifications to the Proposed Submission South Cambridgeshire Local Plan. Major Modifications are more substantive changes which alter the meaning of a policy or strategy (e.g. rewording policies to change their meaning, adding new sites or deleting existing ones).

This document is intended to assist the Inspector in understanding the Council's position. The Schedule of Proposed Major Modifications is part of the Council's evidence and will be available as a Core Document to the Examination. The Major Modifications are changes to include in the plan Parish Council led proposals for housing development at their villages. They are proposed only on the basis that the parish councils concerned have carried out consultation with their local communities and key stakeholders since the Proposed Submission Local Plan consultation that demonstrates support for their proposals, under the Council's approach to Localism. These changes are recommended to the Inspector and would be subject to formal consultation by the Council as Major Modifications after the examination hearings if agreed with the Inspector. An addendum to the Sustainability Appraisal has been produced which considers these modifications.

The proposed major modifications are listed in document order of the draft Local Plan and for each change the schedule includes the following information:

**Ref. No.:** change identification number. The reference number is composed as so:



Major Modification / Chapter of the Local Plan / Change number

Policy / Paragraph: the specific policy or paragraph within the Proposed Submission Local Plan to which the change applies.

Local Plan Page: where the applicable policy or paragraph is located in the Proposed Submission Local Plan.

**Proposed Major Modification:** details of the proposed change. Unless it states otherwise, where text is to be deleted it will have a strikethrough as so: deleted text. Where additional text is proposed, it will be bold and underlined as so: additional text.

Reason for change: the reason why the major modification is proposed, for example, adding a new Parish Council led housing allocation.

**Source of change (Rep. No)**: the person or organisation making the original representation and their representation number.

South Cambridgeshire Local Plan Proposed Submission Consultation Schedule of Proposed Major Modifications to the Proposed Submission Local Plan

Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Major Modification	Reason for change	Source of change (Rep. No.)
Chapter 7:	Delivering Hig	⊥ ah Quali	ity Homes		<u> </u>
MM/7/01	Policy H/1	132	Include a new section to policy H/1 just below the existing policy text with a new sub heading and before its supporting text.  Parish Council Led Allocations for Residential Development in Villages  H/1:i Land at Linton Road, Great Abington Area (ha.) and indicative dwelling capacity: 4.11 ha. 35 dwellings Development requirements:  Retention of the allotments. Retention of boundary trees and hedges except as required to provide for access. Creation of a community orchard on the south of the site to provide a soft green edge. This is a Parish Council led proposal which has been included in the Local Plan because it has demonstrated local support. Developments should seek to fulfil the aspirations of the Parish Council for the site.  H/1:j Land at High Street / Pampisford Road, Great Abington Area (ha.) and indicative dwelling capacity: 0.55 ha. 12 dwellings Development requirements: Retention of boundary trees and hedges except as	Parish Council led proposal pursued through Local Plan instead of Neighbourhood Plan	Great Abington Parish Council (60681) Little Abington Parish Council (60623, 60624) Committee for Abington Housing (60660, 60661, 60662)

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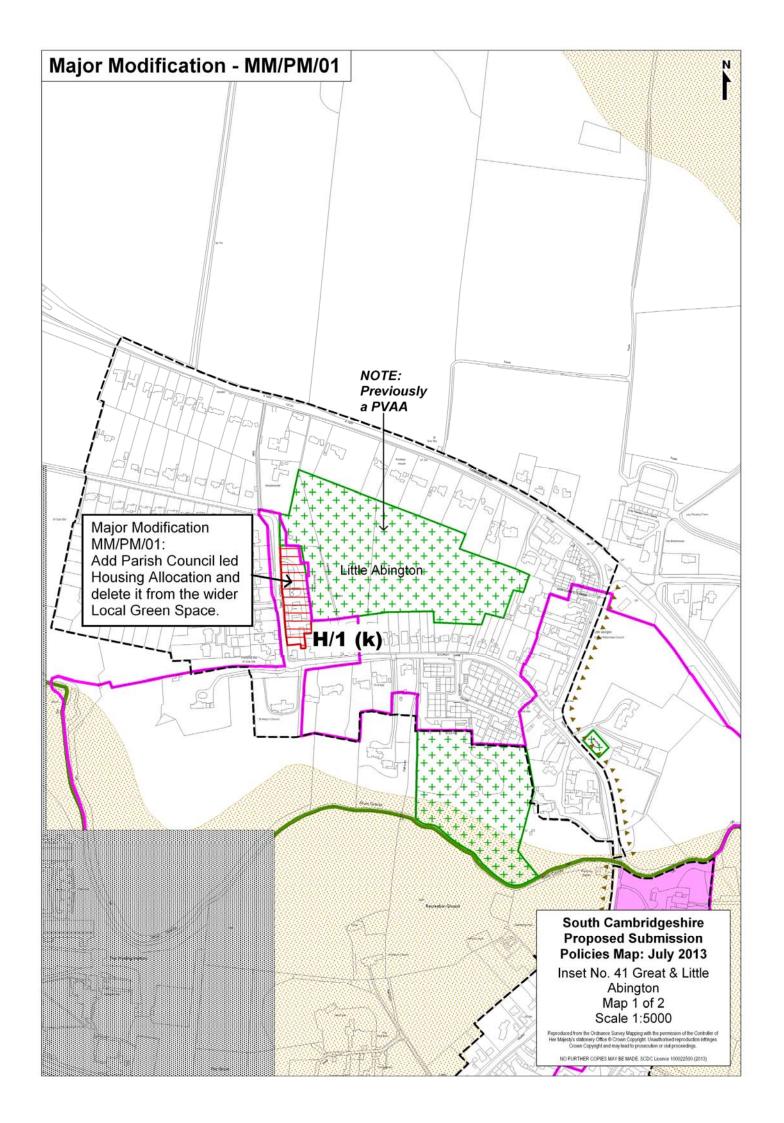
required to provide for access.  Creation of a landscape buffer along the boundary of the site where it adjoins or could be seen from open countryside to provide a soft green village edge.  This is a Parish Council led proposal which has been included in the Local Plan because it has demonstrated local support. Developments should seek to fulfil the aspirations of the Parish Council for the site.  H/1: k Land at Bancroft Farm, Church Lane, Little Abington Area (ha.) and indicative dwelling capacity: 0.42 ha. 6 dwellings  Development requirements:  Enhancement of the Conservation Area with a high quality development of cottages suitable for 'downsizers' with generous room sizes.  Retention of the flint boundary wall either as a boundary wall or as part of built development and except as required to provide for access.  Creation of a landscape buffer along the rear of the site to provide a soft green village edge.  This is a Parish Council led proposal which has been included in the Local Plan because it has demonstrated local support. Developments should seek to fulfil the aspirations of the Parish Council for the site.  And add a new supporting paragraph after 7.7, renumbering the remaining paragraphs:	Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Major Modification	Reason for change	Source of change (Rep. No.)
I I I I X I NO Parien Council lad Villada regidential develonment				<ul> <li>Creation of a landscape buffer along the boundary of the site where it adjoins or could be seen from open countryside to provide a soft green village edge.</li> <li>This is a Parish Council led proposal which has been included in the Local Plan because it has demonstrated local support. Developments should seek to fulfil the aspirations of the Parish Council for the site.</li> <li>H/1: k Land at Bancroft Farm, Church Lane, Little Abington Area (ha.) and indicative dwelling capacity:         <ul> <li>42 ha. 6 dwellings</li> <li>6 bevelopment requirements:</li> <li>6 Enhancement of the Conservation Area with a high quality development of cottages suitable for 'downsizers' with generous room sizes.</li> <li>7 Retention of the flint boundary wall either as a boundary wall or as part of built development and except as required to provide for access.</li> <li>7 Creation of a landscape buffer along the rear of the site to provide a soft green village edge.</li> <li>8 This is a Parish Council led proposal which has been included in the Local Plan because it has demonstrated local support. Developments should seek to fulfil the aspirations of the Parish Council for the site.</li></ul></li></ul>		

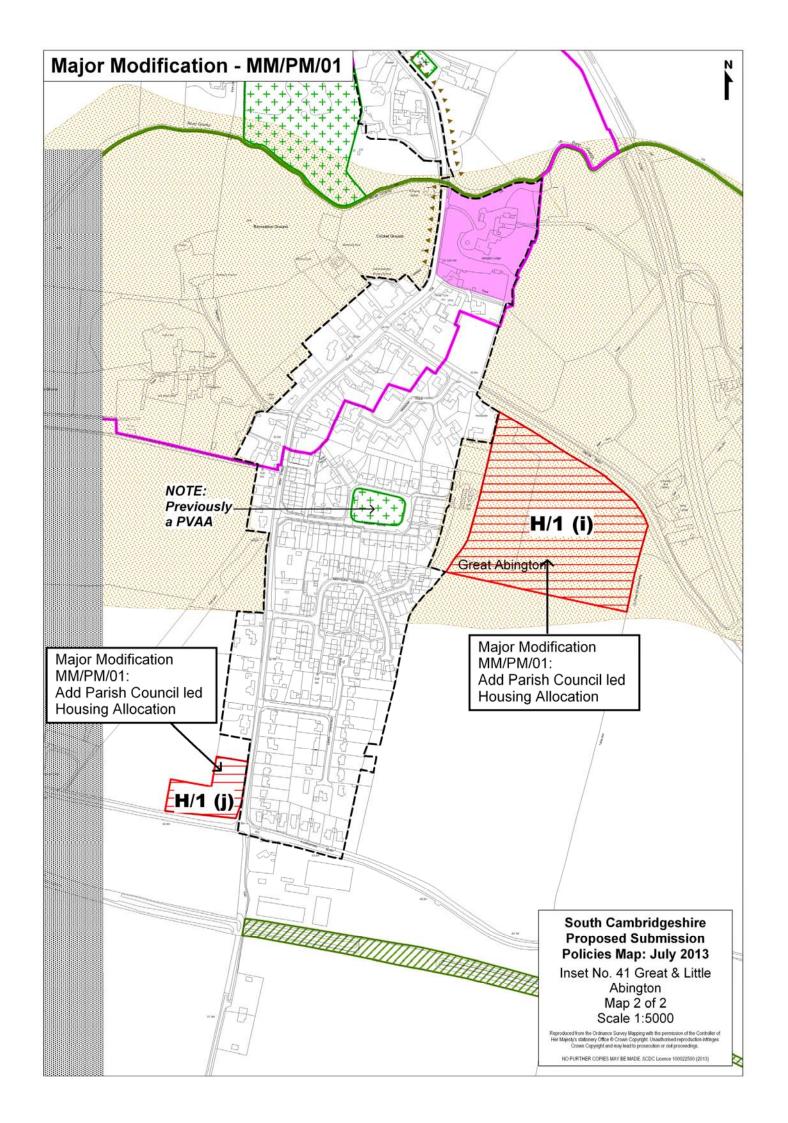
Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Major Modification	Reason for change	Source of change (Rep. No.)
			sites in policy H/1 have been proposed by Parish Councils to meet local aspirations for growth and as an alternative to their preparation of a Neighbourhood Plan. These have been included in the plan as an exception to the sustainable spatial strategy for the district set out in policy S/6 as local support has been demonstrated through local village consultations. Developers should work closely with the relevant Parish Council, and seek to fulfil the aspirations of the Parish Council for the site.		
Policies Mar	)				
MM/PM/01	Great and Little Abington Village Map	Inset 41	Delete Bancroft Farm Church Lane Little Abington from a larger Local Green Space (see maps attached to the schedule of major modifications).  Add the housing allocations in Great and Little Abington referenced in MM/7/01.  (see map MM/PM/01)	Consequential amendment as a result of Parish Council led housing allocation (Ref. No. MM/7/01)	Great Abington Parish Council (60681) Little Abington Parish Council (60623, 60624) Committee for Abington Housing (60660, 60661, 60662)

Note: GRAVELEY - If current public consultation being undertaken by Graveley Parish Council demonstrates support for development further Major Modifications would be added to allocate 2 sites for housing development and include them on the Policies Map. An update will be provided to special Council meeting on 13 March 2014.

South Cambridgeshire Local Plan Proposed Submission Consultation Schedule of Proposed Major Modifications to the Proposed Submission Local Plan

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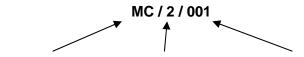
## Appendix B: Schedule of Proposed Minor Changes to the Proposed Submission Local Plan

The schedule outlines the Council's proposed minor changes to the Proposed Submission South Cambridgeshire Local Plan. The suggested amendments seek to update the document, improve clarity and presentation. Minor changes are generally regarded as textual and grammar corrections; re-phrasing or limited new text to add clarity; or updates to figures and references which are necessary due to alterations which have been made elsewhere or for which new information has come to light. In the Council's opinion they do not alter the overall impact of the Local Plan or change its direction, or affect the substance or soundness of the document. The Council has assessed the proposed minor modifications and concluded that further Sustainability Appraisal of the proposed changes is not required.

This document is intended to assist the Inspector in understanding the Council's position. The Schedule of Proposed Minor Changes is part of the Council's evidence and will be available as a Core Document to the Examination. The document will be updated periodically, as necessary, and updates will be placed on the Council's website.

The suggested minor changes are listed in document order of the draft Local Plan and for each change the schedule includes the following information:

Ref. No.: change identification number. The reference number is composed as so:



Minor change / Chapter of the Local Plan / Change number

**Policy / Paragraph:** the specific policy or paragraph within the Proposed Submission Local Plan to which the change applies.

**Local Plan Page:** where the applicable policy or paragraph is located in the Proposed Submission Local Plan.

**Proposed Minor Change:** details of the proposed change. Unless it states otherwise, where text is to be deleted it will have a strikethrough as so: deleted text. Where additional text is proposed, it will be bold and underlined as so: additional text.

Reason for change: the reason why the minor change is proposed, for example, to correct a typo, update text or clarifying.

Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
Chapter 1:	Introduction			
MC/1/01	Paragraph 1.17		Amend Paragraph 1.17 sixth bullet to read:  'Cambridgeshire Minerals and Waste Local Development Framework 2011 _  Core Strategy and Proposals Map C 2011, Site Specific Proposals Plan and Proposals Map A and B 2012.'	Responding to Representations - Correction
Chapter 2:	Spatial Strategy			
MC/2/01	Paragraph 2.8	14	Amend new settlement bullet of paragraph 2.8, as follows:  'Northstowe – new town of 9,500 homes, first phase of which was granted planning permission in 2013 2014 for 1,500 homes and a development framework plan for the whole new settlement agreed at the same time. It is expected that'	Responding to Representations - Clarification
MC/2/02	Paragraph 2.52	32	Add to end of paragraph 2.52:  'They perform a function in serving not only the population within the rural centre but also a rural hinterland of smaller villages.'	Responding to Representations - Clarification
MC/2/03	Policy S/11: Infill Villages	35	Include Streetly End in the list of Infill Villages.	Correction
MC/2/04	Figure 3	39	Amend Figure 3: Housing Trajectory to change the predicted housing completions for Dales Manor Business Park, Sawston, from being delivered in 2017-2021 to being delivered in 2021-2025 in recognition of the pattern of leasehold interests on the site.	Responding to Representations - Update
	Strategic Sites			
MC/3/01	Policy SS/2 Land between Huntingdon Road and Histon Road	51	Amend the wording of the section 12 sub-title from 'Surface Water Drainage' to 'Drainage'.	Responding to Representations - Clarification
MC/3/02	Figure 5	59	Replace the southern-most blue dot on the NIAB site with a yellow star to represent the missing primary school and correct the boundary of the Area of major Change in Cambridge.	Responding to Representations - Formatting
MC/3/03	Figure 6	60	Show schools within the Southern Fringe developments.	Formatting

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Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
MC/3/04	Figure 7	61	Amend reference to Newmarket Road Park and Road Ride	Correcting typo
MC/3/05	Policy SS/5 Waterbeach New Town	66	Add a reference to WW2 structures to criterion 6p as follows:  "p. Assessment, conservation and enhancement of other heritage assets as appropriate to their significance, including non-designated assets such as Car Dyke, <b>World War 2 structures</b> , and the Soldiers Hill Earthworks".	Responding to Representations - Clarification
MC/3/06	Policy SS/5 Waterbeach New Town	66	Add reference to the Farmland Museum in criterion 6ff:  "ff. Review the access arrangements to Denny Abbey and the Farmland Museum".	Responding to Representations - Clarification
MC/3/07	Policy SS/5 Waterbeach New Town	66	Amend text so that 'Arrangements for foul drainage and sewage disposal' is an infrastructure requirement rather than a heading: <u>hi</u> . Arrangements for foul drainage and sewage disposal.	Formatting
MC/3/08	Paragraph 3.36	67	Add the words <u>Farmland Museum</u> to the 5 <sup>th</sup> line of paragraph 3.36: "new town and a substantial green setting for the new town, Denny Abbey <u>and Farmland Museum</u> , and Waterbeach village."	Responding to Representations - Clarification
MC/3/09	Policy SS/6 New Village at Bourn Airfield	69	Change the order of policies in the Local Plan so the policy for Northstowe (SS/7), is before Waterbeach New Town (Policy SS/5), and Bourn Airfield (SS/6) comes after so that policies for the A428 corridor are grouped together.	Formatting
MC/3/10	Policy SS/6 New Village at Bourn Airfield	71	Add to end of policy SS/6 paragraph m – 'Provide a high degree of connectivity to existing corridors and networks, including through an enhanced network of footpaths and bridleways.'	Responding to Representations - Clarification
MC/3/11	Policy SS/6 New Village at Bourn Airfield	71	Reorder the criteria so that criterion t. is included within the 'Significant Improvements in Public Transport' section, rather than 'Measures to Promote Cycling and Walking'	Formatting
MC/3/12	Policy SS/6 New Village at Bourn Airfield	72	Add to end of policy SS/6 paragraph dd – 'Arrangements for foul drainage and sewage disposal, to be explored and identified through a Foul Drainage Strategy'	Responding to Representations - Clarification
MC/3/13	Policy SS/7 Northstowe Extension	74	Correct the factual inaccuracy in line 3 of the policy by deleting 9,500 and replacing it with 10,000.	Responding to Representations - Correction

Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
MC/3/14	Policy SS/8 Cambourne West	75	Add to end of policy SS/8 paragraph 2 – 'This setting will provide part of the publicly accessible green infrastructure of the settlement, and be well connected to Cambourne's existing green network and the wider countryside, including through an enhanced network of footpaths and bridleways.'	Responding to Representations - Clarification
MC/3/15	Policy SS/8 Cambourne West	77	Add to end of policy SS/8 paragraph 14 – 'Satisfactory arrangements being made for foul drainage and sewage disposal, to be explored and identified through a Foul Drainage Strategy:'	Responding to Representations - Clarification
MC/3/16	Paragraph 3.50	78	Amend paragraph 3.50 last sentence — 'The Development must also ensure that it will remain physically separate from Caxton village (the majority of the site falls within Caxton Parish).'	Responding to Representations - Clarification
Chapter 4:	Climate Change			
MC/4/01	Paragraph 4.4	83	Amend the forth bullet point of paragraph 4.4 to read: 'integrating renewable and low carbon energy technologies within a building(s) or delivering community renewable energy projects;'	Responding to Representations - Clarification
MC/4/02	Paragraph 4.9	85	Add to the end of paragraph 4.9: 'Further guidance on what should be included in a Sustainability Statement will be provided in the review of the District Design Guide SPD.'	Responding to Representations - Clarification
MC/4/04	Paragraph 4.11	85	Add a new paragraph after paragraph 4.11 to read (and renumber the remaining paragraphs):  'The policy requires applicants to submit a Sustainability Statement to demonstrate how the principles of climate change mitigation and adaptation have been embedded within the development proposal. The Council would recommend that in the case of larger-scale developments (100 or more dwellings or exceeding 5,000m² of other floorspace) that a BREEAM Communities assessment is undertaken as part of demonstrating how they have integrated sustainable design into the masterplanning process.'	Responding to Representations - Clarification
MC/4/03	Paragraph 4.11	85	Add a new paragraph after paragraph 4.11 to read (and renumber the remaining paragraphs):	Responding to Representations -

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Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
			'To help local authorities, businesses and other organisations to consider the impacts of climate change and appropriate adaptation, the Environment Agency has published 'Climate Ready' – a set of tools and information to help live with the changing climate, guidance on adaptation, and maps showing detailed climate change information for each river basin district (using data from the UK Climate Change Projections 2009).'	To provide guidance
MC/04/05	Paragraph 4.19	88	In paragraph 4.19, amend the two references to <del>2013</del> to be <b>2014</b> .	Responding to Representations - Clarification
MC/04/06	Paragraph 4.20	88	Amend the first sentence of paragraph 4.20 to read: 'The Cambridge Water Company area is in an area of serious water stress as designated by the Environment Agency'	Responding to Representations - Clarification
MC/4/07	Paragraph 4.29	92	Add to end of paragraph 4.29:  'Maps showing the area covered by individual Internal Drainage Boards can be found in the Council's Strategic Flood Risk Assessment.'	Responding to Representations - Clarification
MC/4/08	Paragraph 4.32	93	Amend the last sentence of paragraph 4.32 to read:  'They should be considered from the beginning of the design and masterplanning process-taking account of all opportunities and constraints, including heritage and wildlife assets.'	Responding to Representations - Clarification
MC/4/09	Policy CC/9	93	Amend criterion 1a to split it into two sections - a separate policy element for each sentence.	Responding to Representations - Clarification
MC/4/10	Policy CC/9	93	Amend the first sentence of criterion 1b:  'Suitable flood protection / mitigation measures are incorporated as appropriate to the level and nature of risks, and which can be satisfactorily implemented to ensure safe occupation, access and egress.'	Responding to Representations - Clarification
MC/4/11	Policy CC/9	94	Amend criterion 1c:  'There would be no increase to flood risk elsewhere, and opportunities to reduce flood risk elsewhere have been explored and taken (where appropriate), including limiting discharge of surface water (post development	Responding to Representations - Clarification

Reason for change	nange	Local Plan Page	Policy / Paragraph	Ref. No.
	k rate) to natural greenfield rates or lower,'			
Responding to	f paragraph 4.36:	95	Paragraph 4.36	MC/4/12
Representations -	water management Supplementary Planning Document			
To provide	d in liaison with stakeholders to assist developers and			
guidance	rs with the effective delivery and implementation of the			
Responding to	sentence of paragraph 4.37:	95	Paragraph 4.37	MC/4/13
Representations -	responsible bodies including the Environment Agency,			
Clarification	nternal Drainage Boards, and Cambridgeshire County			
	e consulted, as appropriate.'			
		Places	Delivering High Quality	Chapter 5:
Responding to	sentence of paragraph 5.2 to read:	99	Paragraph 5.2	MC/5/01
Representations -	ne opportunities presented by development to enhance the			
Clarification	environment, and create vibrant communities.			
For consistency	1b to read:	100	Policy HQ/1: Design	MC/5/02
with national policy	nance important natural and historic assets of the site, and		Principles	
Responding to	1e to read:	100	Policy HQ/1: Design	MC/5/03
Representations -	tas, skylines, focal points and appropriately scaled		Principles	
Clarification	routes and around spaces;'		·	
Responding to	1f to read:	100	Policy HQ/1: Design	MC/5/04
Representations -	accessible <del>streets</del> <b>routes</b> both within the		Principles	
Clarification	elivering attractive and safe opportunities for walking, cycling,			
	d public transport;'			
Responding to	ence of paragraph 5.6 to read:	101	Paragraph 5.6	MC/5/05
Representations -	. • .			
Clarification	ountryside'			
Re Re	d public transport;' ence of paragraph 5.6 to read: ng and enhancing the natural and historic environment, and	101	Paragraph 5.6	MC/5/05

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Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
MC/5/06	Paragraph 5.6	101	Add the following text to the end of paragraph 5.6:  'Applicants will be required to demonstrate how their proposals meet the principles of sustainability, by submitting a Sustainability Statement, under policy CC/1 in Chapter 4 Climate Change.'	Responding to Representations - Clarification
MC/5/07	Paragraph 5.9	102	Amend last sentence of paragraph 5.9:  'and Car parking what works where (English Partnerships); and RECAP  Waste Management Design Guide SPD (Cambridgeshire County Council 2012).'	Responding to Representations - To provide guidance
Chapter 6:	<b>Protecting and Enhance</b>	ing the	Natural and Historic Environment	
MC/6/01	Chapter title page	105	Amend the spelling of Wimpole in the picture heading: Wimpole Hall, South Cambridgeshire	Correcting typo
MC/6/02	Key Facts	108	<ul> <li>* South Cambridgeshire has a diverse range of wildlife sites many of which are officially recognised for protection. These include 39 nationally important Sites of Special Scientific Interest and over 100 County Wildlife Sites. Development pressures can threaten the future of some habitats.'</li> </ul>	Responding to Representations - Clarification
MC/6/03	Key Facts	108	**The Cambridgeshire Green Infrastructure Strategy provides an overarching strategy for Cambridgeshire which highlights existing natural green space and opportunities for creating, linking, and improving it. It shows two major ecological networks: the Gog Magogs Countryside Area and the West Cambridgeshire Hundreds project.'	Responding to Representations - Clarification
MC/6/04	Paragraph 6.16	112	Add to end of paragraph 6.16, ' thereby contributing to wider ecological networks.'	Responding to Representations - Clarification
MC/6/05	Policy NH/5: Sites of Biodiversity or Geological	113	Amend Policy NH/5 paragraph 1 to read: '1Exceptions will only be made where the benefits of the development clearly demonstrably and significantly outweigh any adverse impact.'	Responding to Representations - Clarification

Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
	Importance			
MC/6/06	Policy NH/5: Sites of Biodiversity or Geological Importance	113	Amend Policy NH/5 paragraph 2a to read: 'The <b>international</b> , national or local status and designation of the site.'	Responding to Representations - Clarification
MC/6/07	Policy NH/5: Sites of Biodiversity or Geological Importance	113	Amend Policy NH/5 2e to read:  'The need for compensatory measures in order to re-create on or off the site remaining features or habitats on or off the site.that would be lost to development'	Responding to Representations - Clarification
MC/6/08	Paragraph 6.27	115	Amend second sentence of paragraph 6.27 to read: ' It includes a wide range of elements such as country parks, wildlife habitats, rights of way, <b>bridleways</b> commons and greens, nature reserves, waterways and bodies of water, and historic landscapes and monuments.'	Responding to Representations - Clarification
MC/6/09	Paragraph 6.31	117	Add the following to end of paragraph 6.31:  'An example of a Green Infrastructure project coming forward is a River Cam Corridor Strategy which is being prepared by local stakeholders.'	Responding to Representations - Clarification
MC/6/10	Paragraph 6.34	119	Amend paragraph 6.34 to read: '6.34. The area of Green Belt in South Cambridgeshire comprises 23,000 hectares covering over 25% of the district. This means much of the district is affected by Green Belt policies particularly those villages surrounding Cambridge and the NPPF gives strong protection to the Green Belt.'	Responding to Representations - Clarification
MC/6/11	Paragraph 6.35	119	Amend paragraph 6.35 to read:  '6.35 Green Belt is a key designation in the district, designed to protect the setting and special character of Cambridge. Even where exceptional circumstances warrant changes to the Green Belt or a Inappropriate development will not be approved except in very special circumstances.  All development proposals is including those considered appropriate form	Responding to Representations - Clarification

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Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
			of development in the Green Belt, it-will need to be designed and landscaped to ensure they do not have an adverse impact on wider rural character and openness.'	
MC/6/12	Policy NH/9: Redevelopment of Previously Developed Sites and Infilling in the Green Belt	119	Amend part 1 of Policy NH/9 to read:  'The Council will seek to ensure that the partial or complete redevelopment of previously developed sites in the Green Belt will be limited to that which would not result in:'	Responding to Representations - Clarification
MC/6/13	Policy NH/9: Redevelopment of Previously Developed Sites and Infilling in the Green Belt	119	Amend the first sentence of part 2 of Policy NH/9 to read: 'Infilling is defined as the filling of small gaps between built developments development in the Green Belt.'	Responding to Representations - Clarification
MC/6/14	Paragraph 6.36	119	Amend paragraph 6.36 to read:  'The NPPF now enables limited infilling or the partial or complete redevelopment of previously developed sites in the Green Belt. Planning applications will be assessed to ensure that such infilling or redevelopment does not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.	Responding to Representations - Clarification
MC/6/15	Policy NH/14: Heritage Assets	122	Replace word in section 2(d) in Policy NH/14: 'Undesignated heritage asset' replaced with 'non-designated heritage asset'.	Responding to Representations - Clarification
MC/6/16	Paragraph 6.48	123	Amend the last sentence of paragraph 6.48 to read: A full understanding of the historic environment, including traditional materials as used in vernacular buildings, is needed to inform plans'	Responding to Representations - Clarification
MC/6/17	Paragraph 6.49	124	Replace the last two sentences para 6.49 with the following:  'The NPPF states harm to heritage assets should be avoided, but where proposals would result in wider public benefits then those benefits need to be weighed against the harm to significance'.	Responding to Representations - Clarification

Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
MC/6/18	Paragraph 6.51	124	Add to end of paragraph 6.51:  'The Council is committed to ensuring the future viable uses of assets	Responding to Representations -
			within the district.'	Clarification
MC/6/19	Paragraph 6.56	124	Amend the first sentence of paragraph 6.56 to read:	Responding to
			'The Cambridgeshire Historic Environment Record, held by maintained by	Representations -
			the County Council gives information on archaeological sites and monuments	Clarification
			provides information on heritage assets, including non-designated and	
			designated heritage assets with archaeological interest.'	
MC/6/20	Paragraph 6.57	124	Replace paragraph 6.57 with the following:	Responding to
			'Where development resulting in the loss of a heritage asset is	Representations -
			permitted, the developer will be required to record and advance the	Clarification
			understanding of the heritage asset to be lost. The results of	
			assessments and investigations which are required and collected as	
			part of development management are of public interest and will be made	
			accessible, normally through the County's Historic Environment	
			Record.'	
	Delivering High Qualit			<u> </u>
MC/7/01	Paragraph 7.7	133	Add additional text to paragraph 7.7 after the first sentence as follows:	Responding to
			(A development or melococcut will such contact the development of	Representations -
			'A development requirement will apply unless it can be demonstrated	Clarification
			when a planning application for site development is submitted, that a	
			requirement is no longer needed, or it could be better addressed in a	
N40/7/00	D !: 11/011 :	400	different way either on or off site.'	D " (
MC/7/02	Policy H/8:Housing	139	To improve clarity, reword the text at section 2 (f) and make it into a new	Responding to
	Mix		section 3, renumbering the remaining sections:	Representations -
			'2. The mix of market homes to be provided an aites of 0 or fewer homes	Clarification
			'3. The mix of market homes to be provided on sites of 9 or fewer homes	
MC/7/03	Dorograph 7.64	155	taking will take account of local circumstances'.	Doonanding to
IVIC/7/03	Paragraph 7.61	155	Amend paragraph 7.61 to read:  'Government policy requires Councils to maintain a five year land supply of	Responding to Representations -
			'Government policy requires Councils to maintain a five year land supply of	Lizebieseilialions -

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Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
			Travellers sites, in a similar way to housing, and identify deliverable sites to meet the needs to meet identified for the first five years. Between January 2011 and May 2013 January 2014, the Council had granted or resolved to grant planning permission for 72 79 pitches. In addition, a site at Chesterton Fen Road for 26 pitches, on land identified for Gypsy and Traveller pitches in the South Cambridgeshire Local Plan 2004, had been recently completed is under construction at time of writing, with a number of pitches now occupied. Therefore sufficient sites have come forward through windfall planning applications to meet the identified need. The Plan does not propose any further allocations.'	Updating
	Building a Strong and			
MC/8/01	Policy E/5: Papworth Hospital	170	Amend Policy E/5 paragraph 3c to read: 'Maintain and enhance the present setting of Papworth Hall'	Responding to Representations - Clarification
MC/8/02	Paragraph 8.19	170	Amend Para 8.19 to read: 'The buildings identified include the Bernhard Baron Hospital Building and Princess Hospital Building (both are examples of hospital buildings designed specifically for tuberculosis patients with design features to ensure access to sunlight and fresh air) and the Sims Woodhead Memorial Laboratory Building-(Lakeside Lodge).'	Responding to Representations - Clarification
MC/8/03	Policy E/6: Duxford Imperial War Museum	171	Amend Policy E/6 paragraph 1 to read:  'The Imperial War Museum site at Duxford Airfield is of national significance, and will be treated as a special case as a museum which is a major tourist / visitor attraction, educational and commercial facility.'	Responding to Representations - Clarification
MC/8/04	Policy E/6: Duxford Imperial War Museum	171	Amend Policy E/6 paragraph 2 to read:  'Proposals will be considered with regard to the particular needs and opportunities of the site and any proposals involving the use of the estate and its facilities for museum uses or non-museum uses must be <b>complementary</b> complimentary to the character, vitality and sustainability of the site as a branch of the Imperial War Museum.'	Responding to Representations - Correcting typo

Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
MC/8/05	Paragraph 8.23	171	Amend first sentence of paragraph 8.23 to read: 'The Imperial War Museum Duxford ( <u>IWM Duxford</u> <del>IWMD</del> ) is an integral element of the multi branch Imperial War Museums and is a major tourist / visitor attraction, educational and commercial facility based on a long established airfield.'	Responding to Representations - Clarification
MC/8/06	Paragraph 8.23	172	Add additional text after 5 <sup>th</sup> sentence of 8.23 as follows:  'Duxford is regarded as the finest and best-preserved example of a fighter base representative of the period up to 1945 in Britain, with an exceptionally complete group of First World War technical buildings in addition to technical and domestic buildings typical of both inter-war Expansion Periods of the RAF. It also has important associations with the Battle of Britain and the American fighter support for the Eighth Air Force. Development proposals will need to consider the impact on this important heritage asset, in accordance with the National Planning Policy Framework and Policy NH/14.'	Responding to Representations - Clarification
MC/8/07	Policy E/7Fulbourn and Ida Darwin Hospitals and paragraphs 8.25 to 8.36)	172	Move policy E/7 and supporting text (8.25 to 8.36) to Chapter 7 (Delivering High Quality Homes), and place after paragraph 7.13.	Formatting
MC/8/08	Paragraph 8.37	176	Add additional paragraph before 8.37:  'This policy is a Parish Council led proposal, reflecting the community led approach to the local plan, enabling it to address local issues without the need for a neighbourhood plan. It was subject to consultation during plan making and received clear support.'	Responding to Representations - Clarification
MC/8/09	Policy E/10: Shared Social Spaces in Employment Areas	178	Amend first part of Policy E/10 to read:  'Appropriately scaled Small-scale leisure, eating and social hub facilities will be permitted in business parks and employment areas where:'	Responding to Representations - Clarification
MC/8/10	Policy E/19: Tourist	186	Amend Policy E/19 part d to read:	Responding to

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Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
	Facilities and Visitor Attractions		'The scheme is in scale with its location, <u>and the nature of the facility it</u> <u>supports</u> particularly in relation to the amount and nature of traffic generated;	Representations - Clarification
MC/8/11	Policy E/19: Tourist Facilities and Visitor Attractions	186	Amend Policy E/19 part e to read: The proposal maximises sustainable travel opportunities, including walking, cycling, <a href="https://norse-riding">horse-riding</a> and public transport. Proposals which would have a significant adverse impact in terms of the amount or nature of traffic generated will be refused'	Responding to Representations - Clarification
	Promoting Successful	1		
MC/9/01	Key Facts	194	<ul> <li>Amend bullet 9 to read:</li> <li>Sport and play space is important for supporting healthy lifestyles <u>and</u> improving both the physical and mental wellbeing of communities.</li> </ul>	Responding to Representations - Clarification
MC/9/02	Paragraph 9.4	194	Amend paragraph 9.4 to read:  'The Council has published an updated Recreation and Open Space Study 2013. This has provided information on the provision of open space within the district and how this is meeting local need. As a result of this review sites for open space and recreation uses have been carried forward from the previous Plan'	Responding to Representations - Clarification
MC/9/03	Paragraph 9.9	196	Add to the end of paragraph 9.9:  'The local community can highlight the facilities it values within its parish by applying for them to be included on the register of Community Assets held by the Council.'	Responding to Representations - Clarification
MC/9/04	Policy SC/4: Meeting Community Needs	197	Add ' <u>i. cultural buildings'</u> to the list in section 4 of Policy SC/4: Meeting Community Needs.	Responding to Representations - Clarification
MC/9/05	Paragraph 9.13	199	Add new paragraph after 9.13 which states:  'As part of the development of a new community the Council recognises the importance of working with local parish councils to consider at an early stage the form of governance that would be most appropriate for major developments such as new settlements. Similar consideration may also apply where developments are physically an extension to one village but lie within an adjoining parish.'	Responding to Representations - Clarification

Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
MC/9/06	Paragraph 9.24	202	Amend paragraph 9.24 as follows:  ' These are primarily owned and operated by parish councils, although the use of management companies is becoming more common within new developments.   The Council published a Recreation and Open Space Study (2013) which has provided information on the quantity and quality of the open space across the district.	Responding to Representations - Clarification
MC/9/07	Paragraph 9.31	204	Amendment to paragraph 9.31 to refer to the Recreation and Open Space Study 2013.	Clarification
MC/9/08	Policy SC/12: Contaminated Land	209	Amend policy to read:  Policy SC/12: Contaminated Land Land Contamination.  Where development is proposed on contaminated land or land suspected of being impacted by contaminants the Council will require developers to include as assessment of the extent of contamination and any possible risks to human health and/or the environment. Proposals will only be permitted where land is, or can be made, suitable for the proposed use.	Responding to Representations - Clarification
Chapter 10	Promoting and Delive	ering Sus	stainable Transport and Infrastructure	
MC/10/01	Paragraph 10.2	217	Add to the end of paragraph 10.2: ' The Local Plan will assist with the delivery of requirements and aspirations within current and emerging transport plans and strategies.'	Responding to Representations - Clarification
MC/10/02	Paragraph 10.4	217	Add an additional paragraph after 10.4 (and renumber the remaining paragraphs):  'A few rural parts of the district are well served by rail, for example the A10 corridor both north and south of Cambridge, while others rely on the markets towns and Cambridge for access to the railway network. Improved access to stations and interchanges, for example improved cycle access via cycle path networks or quiet routes, can help encourage more people to cycle and more people to travel by train rather than car. In Cambridge, the new Science Park Station and Interchange will contribute to the growth of rail use and will be essential to provide interchange facilities.'	Responding to Representations - Clarification

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Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
MC/10/03	Key Facts	219	Add a new bullet to the key facts after the 5 <sup>th</sup> bullet:  'A few rural parts of the district, for example the A10 corridor both north and south of Cambridge, are well served by rail, while others rely on the markets towns and Cambridge for access to the railway network.'	Responding to Representations - Clarification
MC/10/04	Policy TI/2: Planning for Sustainable Travel	220	Amend criterion 2b to read: 'Provision of new cycle and, walking and horse riding routes'	Responding to Representations - Clarification
MC/10/05	Policy TI/2: Planning for Sustainable Travel	220	Amend criterion 2c to read:  'Protection and improvement of existing cycle and, walking and horse riding routes,'	Responding to Representations - Clarification
MC/10/06	Paragraph 10.18	222	Amend paragraph 10.18 to read:  'how they will be addressed, and how sustainable travel will be delivered in the long term. These should be agreed with the highway authority. For smaller developments with lower impacts, a simpler 'Transport Statement' is required, which should demonstrate how it will encourage travel planning activities'	Responding to Representations - Clarification
MC/10/07	Policy TI/3: Parking Provision	225	Amend the indicative car parking standard for A2 Uses to read: '1 space per 2 <u>5</u> m <sup>2</sup> '	Responding to Representations - Correcting typo
MC/10/08	Paragraph 10.29	230	Amend the first sentence of paragraph 10.29 to read: 'aerodromes and smaller airfields in the district, including IWM Duxford with its large collection of flying historic aircraft.'	Responding to Representations - Clarification
MC/10/09	Paragraph 10.33	231	Add a new section after paragraph 10.33 (and renumber the remaining paragraphs):  'Air Safeguarding Zones  10.34 Applications for development within Cambridge Airport's Air Safeguarding Zones (shown in Figure 12a) will be the subject of consultation with the operator of the airport and the Ministry of Defence.	Responding to Representations - Clarification
			Restrictions in height, or changes to the detailed design of development may be necessary to mitigate the risk of aircraft accident and maintain	

Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
			the operational integrity of the airport.  10.35 The purpose of airport safeguarding is to take the measures necessary to ensure the safety of aircraft, their passengers and crew while taking off or landing or while flying in the vicinity of Cambridge Airport. This is achieved by assessing proposed development so as to:  • protect the air through which aircraft fly;  • protect the integrity of radar and other electronic aids to air navigation;  • protect visual aids, such as approach and runway lighting, by preventing them from being obscured, or preventing the installation of other lights; and  • avoid any increase in the risk to aircraft of a birdstrike.  10.36 A similar Aerodrome Safeguarding Zone applies to the Imperial War Museum Duxford (shown in Figure 12b). Applications for development within Duxford's Air Safeguarding Zones will be the subject of consultation with the aerodrome operator.'  (Maps are attached to the end of this schedule)	
MC/10/10	Policy TI/8: Infrastructure and New Developments	233	Amend criterion 3 as follows:  'Developers should must engage with the Children's Services Authority at the earliest opportunity'	Responding to Representations - Clarification
Appendix A	Supporting Documer	nts and E	Evidence Base	
MC/AA/01	Appendix A	241 to 257	A number of hyperlinks to reference documents have changed since the plan was published. These will be updated for the submission plan. The date of the Recreation Study has been corrected to 2013.	Update
MC/AA/02	Appendix A	241 to 257	A number of documents were referred to the text of the plan, and including hyperlinks to the documents. To make the plan more useable these will be	Clarification

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Plar		Local Plan Page	Proposed Minor Change	Reason for change
			added to the list in appendix A. A list is included at the end of this schedule.	
	Note: New documents referred to in the Portfolio Holder Report will be added to the evidence base list if agreed.			
Appendix (	C: Glossary			
MC/AC/01		265	Add 'Building for Life standard' to the glossary with the following definition:  Building for Life is a useful tool for gaining an indication of how well- designed homes and neighbourhoods are.	Clarification
MC/AC/02		265	Add 'Cambridge Area' to the glossary with the following definition:  The area covered by Cambridge City Council and South Cambridgeshire  District Council.	Clarification
MC/AC/03		271	Add 'General Permitted Development Order' to the glossary with the following definition:  Provides permitted development rights which allow certain types of development to proceed without the need for a planning application.	Clarification
MC/AC/04		271	Add 'Green Corridor' to the glossary with the following definition:  Area of open land which penetrates into an urban area for amenity and recreation.	Clarification
MC/AC/05		273	Add 'High Quality Public Transport' to the glossary with the following definition (source: adopted Local Development Framework):  Generally service frequencies of at least a 10 minutes peak / 20 minutes inter-peak. Weekday evening frequencies of ½ hourly until 11pm,  Saturday ½ hourly 7am - 6pm, then hourly and Sunday hourly 8am -  11pm. Also provides high quality low floor / easy access buses, air conditioning, prepaid / electronic ticketing, Real Time information and branding to encourage patronage.	Clarification
MC/AC/06		276	Add 'Local Needs' to the glossary with the following definition:  The definition varies depending on the circumstances in which it is used. Where talking about types of housing or employment provision in	Clarification

Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
			the district it will often relate to the needs of the wider Cambridge area.  Where talking about local needs as identified through the Strategic  Housing Market Assessment it refers specifically to the needs of the housing market area. With regards to exception sites for affordable housing it refers to the needs of the village / parish.	
Policies Ma	ip			
MC/PM/1	Key	Key	Remove 'Housing Allocation (Policy SS/1 & SS/2)' and add to list of polices to 'Major Development Site' to read: Policies CSF/3, NS/3, NW/4, <b>SS/1, SS/2</b> , SS/3 (2) <b>SS/4</b>	Formatting
MC/PM/2	Key	Key	Add H/2, H/3 and TI/1 to list of policies under 'Special Policy Area'	Formatting
MC/PM/3	Key	Key	Amend policy listed against Conservation Area to read: Policy NH/14	Formatting
MC/PM/4	Key	Key	Amend policy listed against the three Lordsbridge Areas to read: Policy TI/7	Formatting
MC/PM/5	Key	Key	Amend policy listed against the Country Park to read: Policies CE21(1) & CSF/ <b>5</b> (1a)	Formatting
MC/PM/6	Key	Key	Amend policy listed against the Improved Landscaping to read: Policies CSF/5 (1b-e) & CSF/5 (2f-m)	Formatting
MC/PM/7	Key	Key	Amend Minerals and Waste section from Waste Waster to read:  Waste Water	Formatting
MC/PM/8	District Wide (North West)	1 of 4	Amend label of 103 to 104 for Waterbeach inset boundary outline	Formatting
MC/PM/9	Bourn Airfield New Village	Map I	Correct the Policies Map to colour the former Thyssen Krupp site as major development site (orange), rather than the employment allocation colour (purple). (see map attached to this the schedule)	
MC/PM/10	Cambourne West	Map J		
MC/PM/11	Harston Village Map	Inset 50	Amend the LGS boundary on the Harston Village Map to exclude farmland:  • Harston – Recreation Ground and orchard.	Correcting

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Ref. No.	Policy / Paragraph	Local Plan Page	Proposed Minor Change	Reason for change
		1 agc	(see map attached to this the schedule)	
MC/PM/12	Orwell Village Map	Inset 83	Amend the LGS boundary on the Orwell Village Map to exclude farmland:  • Orwell – Chapel Orchard by the Methodist Church (see map attached to this the schedule)	Correcting
MC/PM/13	Cambourne Village Map	Inset 14	Amend the LGS boundary on the Cambourne (Upper) Village Map, to correct boundary to exclude development: (see map attached to this the schedule)	Correcting

#### MC/AA/22 - Additional documents to be referenced in Appendix A

#### Chapter 2

Document	Author (or prepared for)	Year Published	Link
Population, Housing and Employment Forecasts Technical Report	Cambridgeshire County Council	12013	http://www.cambridgeshireinsight.org.uk/housing/current-version/PopHseEmp_TechReport2013

### Chapter 4

Document	Author (or prepared for)	Year Published	Link
Considerate Constructor Scheme	Construction Industry	2013	http://www.ccscheme.org.uk/
Groundwater Source Protection Zone Maps	Environment Agency	2013	http://maps.environment- agency.gov.uk/wiyby/wiybyController?x=357683.0 &y=355134.0&scale=1&layerGroups=default&ep= map&textonly=off⟨=_e&topic=groundwater

Indicative floodplain maps	Environment Agency	2013	http://www.environment- agency.gov.uk/homeandleisure/37837.aspx
BREEAM Communities assessment	BRE	2012	http://www.breeam.org/page.jsp?id=372
BREEAM Standard	BRE	2011	http://www.breeam.org/BREEAM2011SchemeDocument/
Climate Ready	Environment Agency	-	http://www.environment- agency.gov.uk/research/137557.aspx
Adaptation Planning	Environment Agency	-	http://www.environment- agency.gov.uk/research/planning/132423.aspx
Climate Change Information for each River Basin District	Environment Agency	-	http://www.environment- agency.gov.uk/research/planning/135749.aspx
UK Climate Change Projections 2009	Environment Agency, Met Office and others	-	http://ukclimateprojections.metoffice.gov.uk/

### Chapter 5

Document	Author (or prepared for)	Year Published	Link
RECAP Waste Management Design Guide SPD	Cambridgeshire County Council	2012	http://www.cambridgeshire.gov.uk/environment/planning/mineralswasteframework/recapwastemanagementdesignguidespd.htm
Design & Access Statements Briefing Note	South Cambridgeshire District Council	2010	https://www.scambs.gov.uk/sites/www.scambs.gov .uk/files/documents/D%26AS%20Guidance%20No te_April2010%20LOW%20RES.pdf
Car parking what works where	English Partnerships	2006	http://www.homesandcommunities.co.uk/car- parking-what-works-where
By Design	DETR	2000	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7665/158490.pdf

South Cambridgeshire Local Plan Proposed Submission Consultation Schedule of Proposed Minor Changes to the Proposed Submission Local Plan

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	Llewelyn-Davies for English			
	Urban Design Compendium	Partnerships, The Housing	2000	http://www.homesandcommunities.co.uk/urban-
Orban Design Compendium	Corporation and Urban	2000	design-compendium?page_id=&page=1	
		Design Alliance		

#### Chapter 6

Document	Author (or prepared for)	Year Published	Link
East of England Landscape Typology	Landscape East	2010	http://landscape-east.org.uk/map.html

# Chapter 7

Document	Author (or prepared for)	Year Published	Link
South Cambridgeshire Local Plan 2004	South Cambridgeshire District Council	2004	https://www.scambs.gov.uk/content/local-plan- 2004

# Chapter 8

Document	Author (or prepared for)	Year Published	Link
Northstowe Area Action Plan	South Cambridgeshire District Council	2007	https://www.scambs.gov.uk/content/northstowe- area-action-plan

### Chapter 9

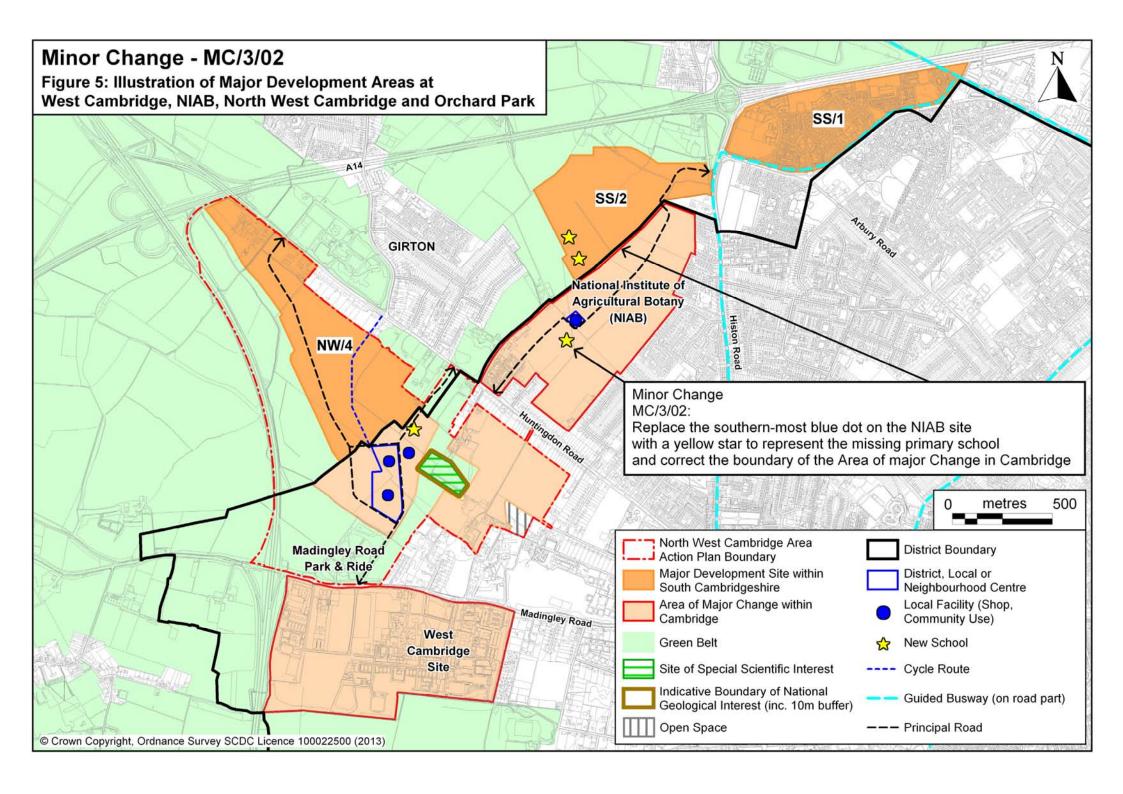
Document Author (o	r prepared for) Year Published	Link
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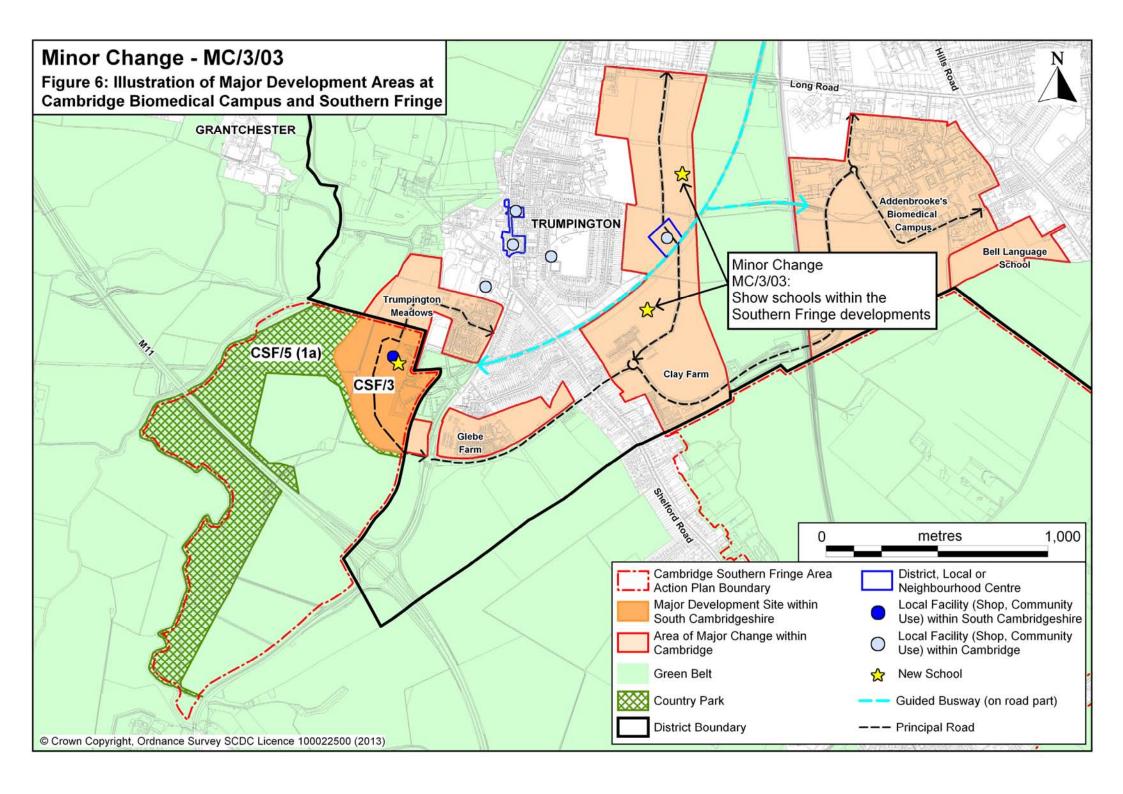
Cambridgeshire and Peterborough Minerals and Waste Local Development Framework	Minorals Cambridgeshire County		http://www.cambridgeshire.gov.uk/environment/pla
	I Council & Peterborough City	2012	nning/mineralswasteframework/mineralsandwaste
	Council		<u>plan.htm</u>

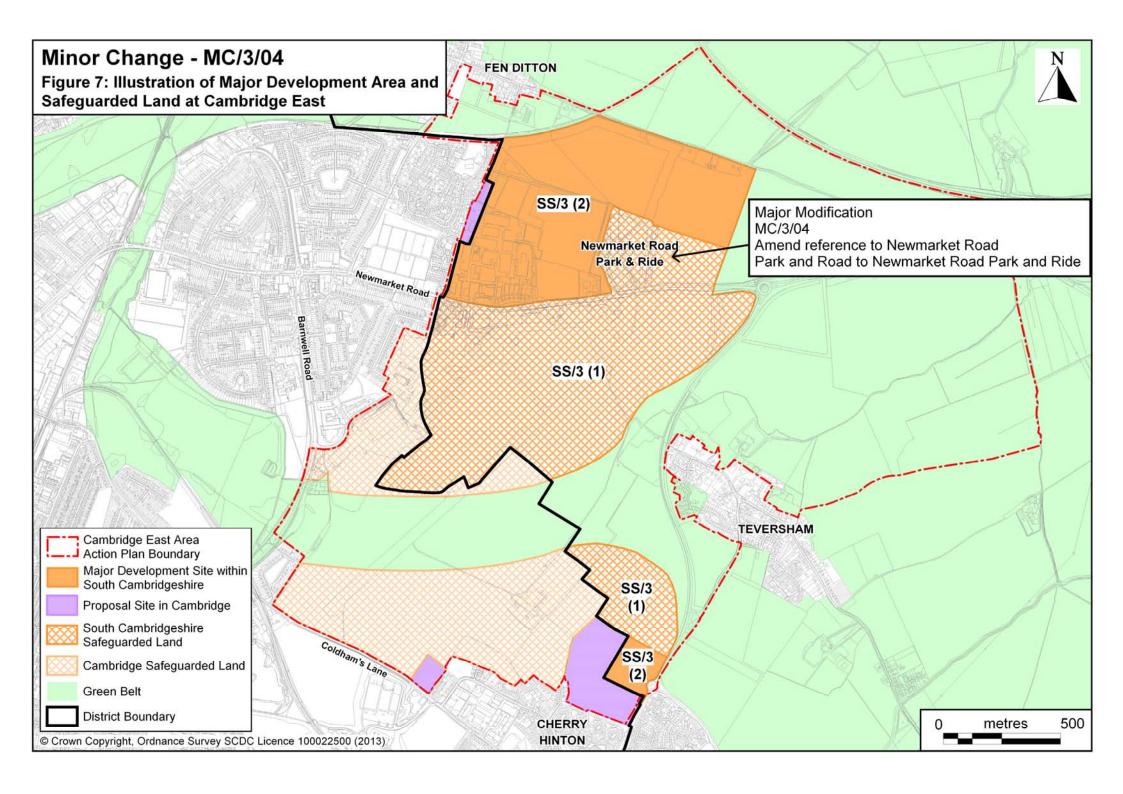
### Chapter 10

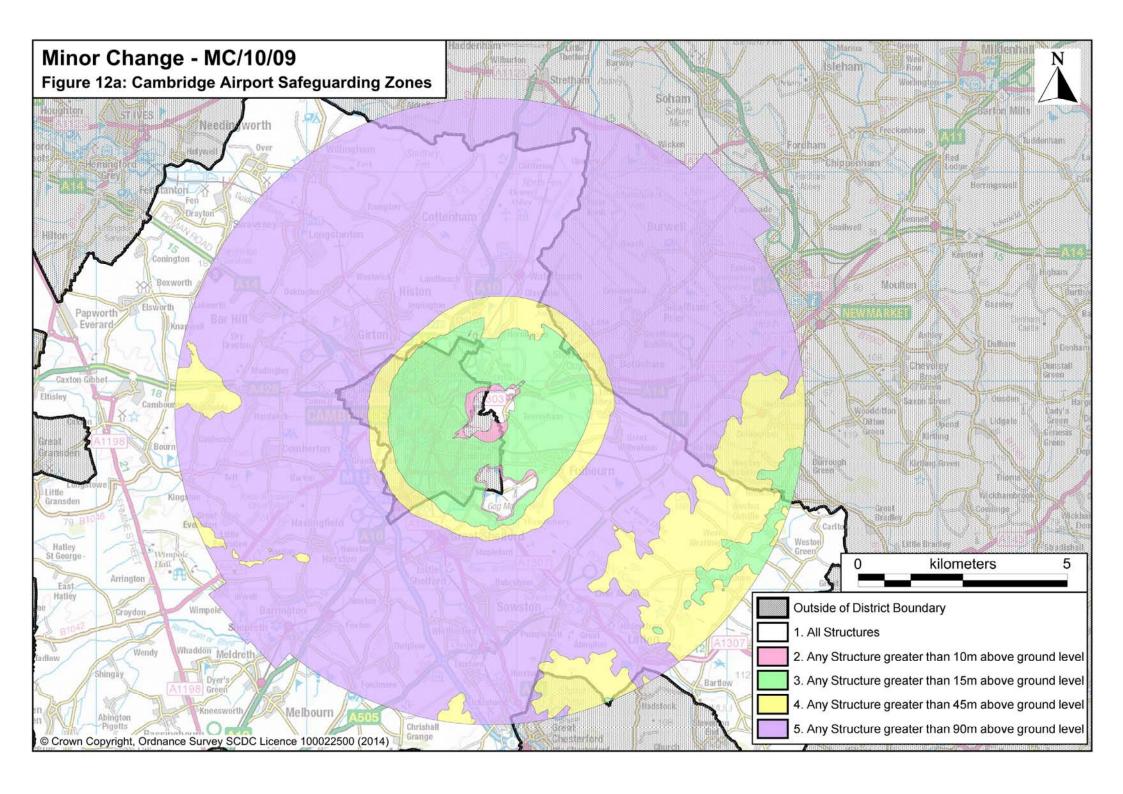
Document	Author (or prepared for)	Year Published	Link
Smarter Choices: Working with businesses and people to reduce the need to travel	Department for Transport	2012	https://www.gov.uk/government/policies/improving-local-transport/supporting-pages/working-with-businesses-and-people-to-reduce-the-need-to-travel
Cambridgeshire and Peterborough Structure Plan	Cambridgeshire County Council & Peterborough City Council	2003	http://www.cambridgeshire.gov.uk/NR/rdonlyres/E 5D7DF57-9987-481F-9BFE- 78B0D0D27BAE/0/StructurePlan.PDF
Guidance on Travel Plans	Cambridgeshire Travel for Work Partnership	-	http://www.tfw.org.uk/

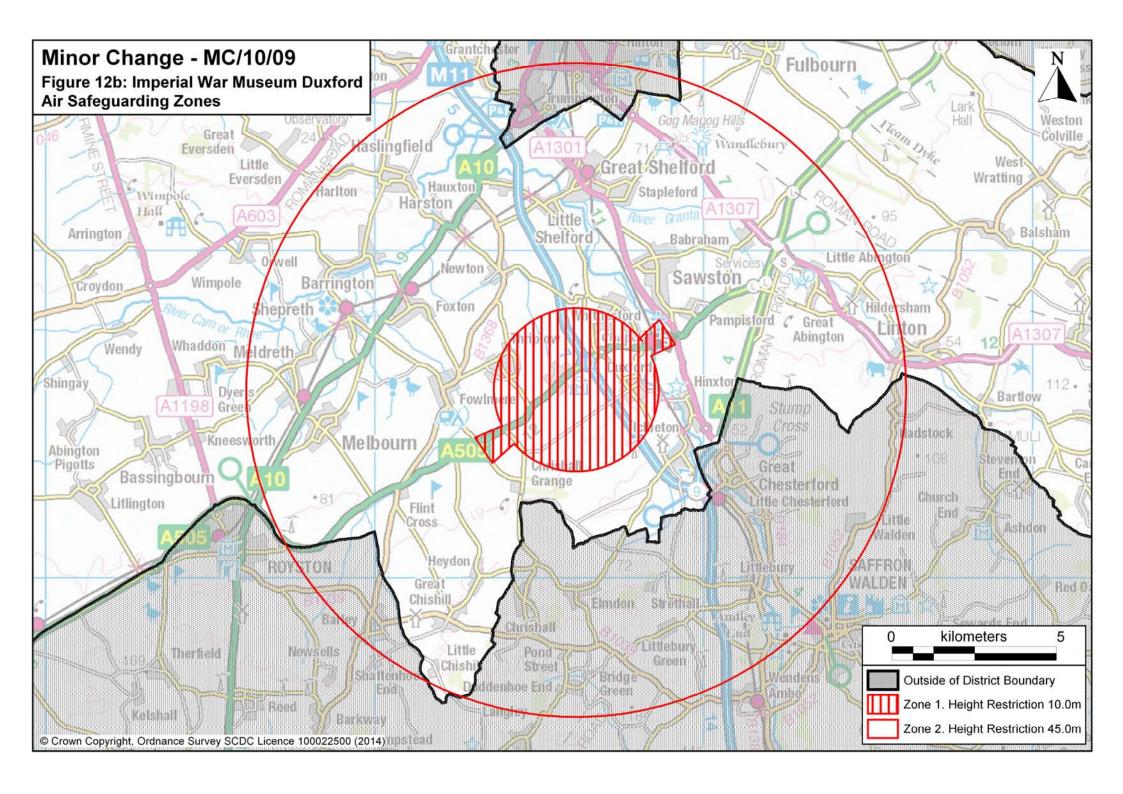
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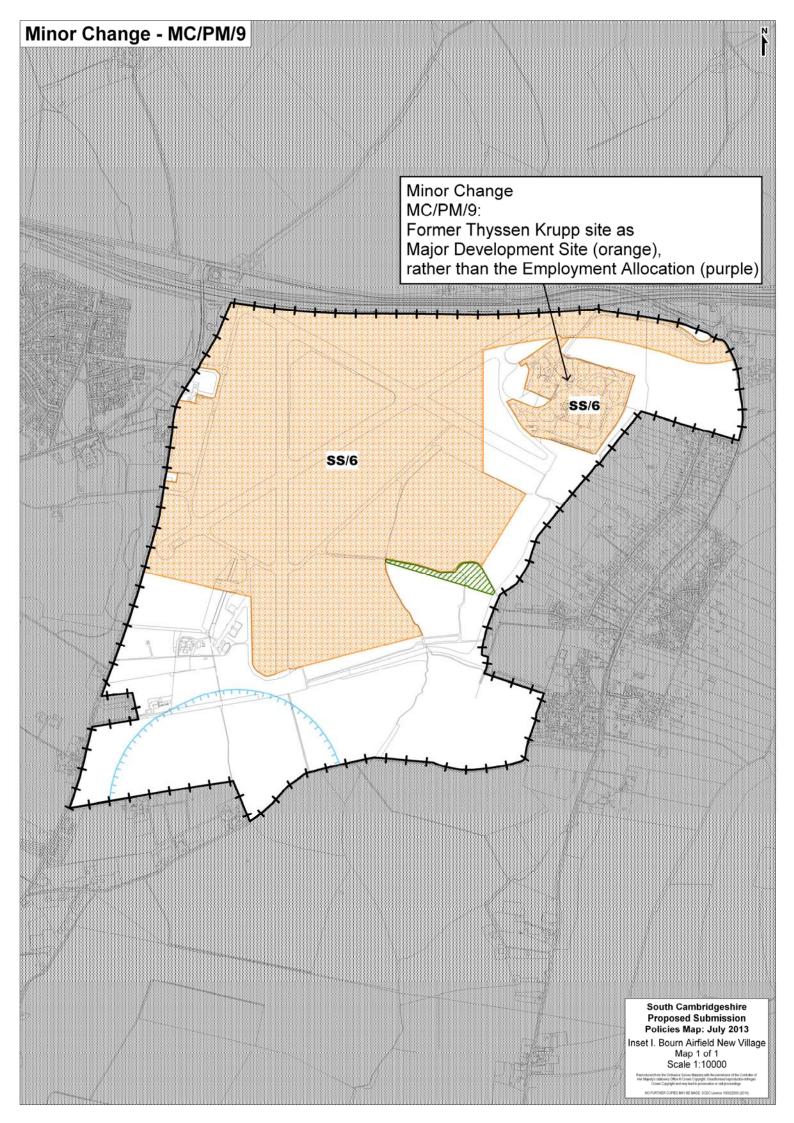


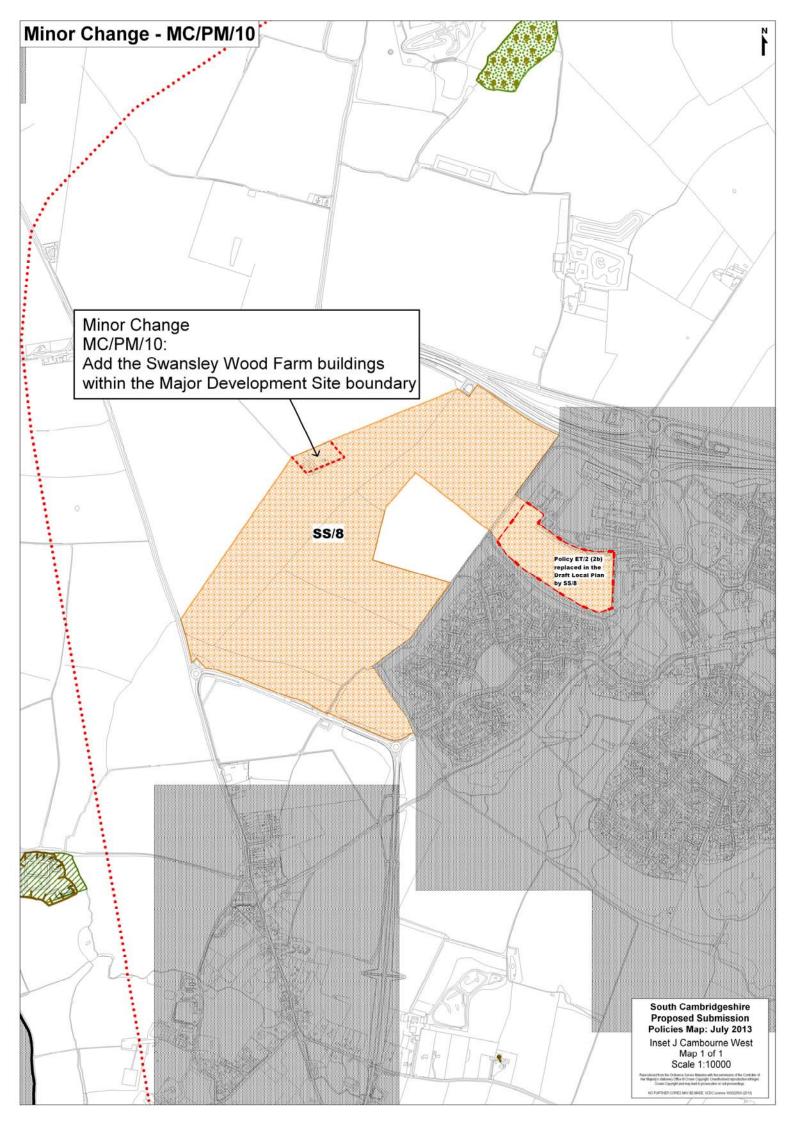


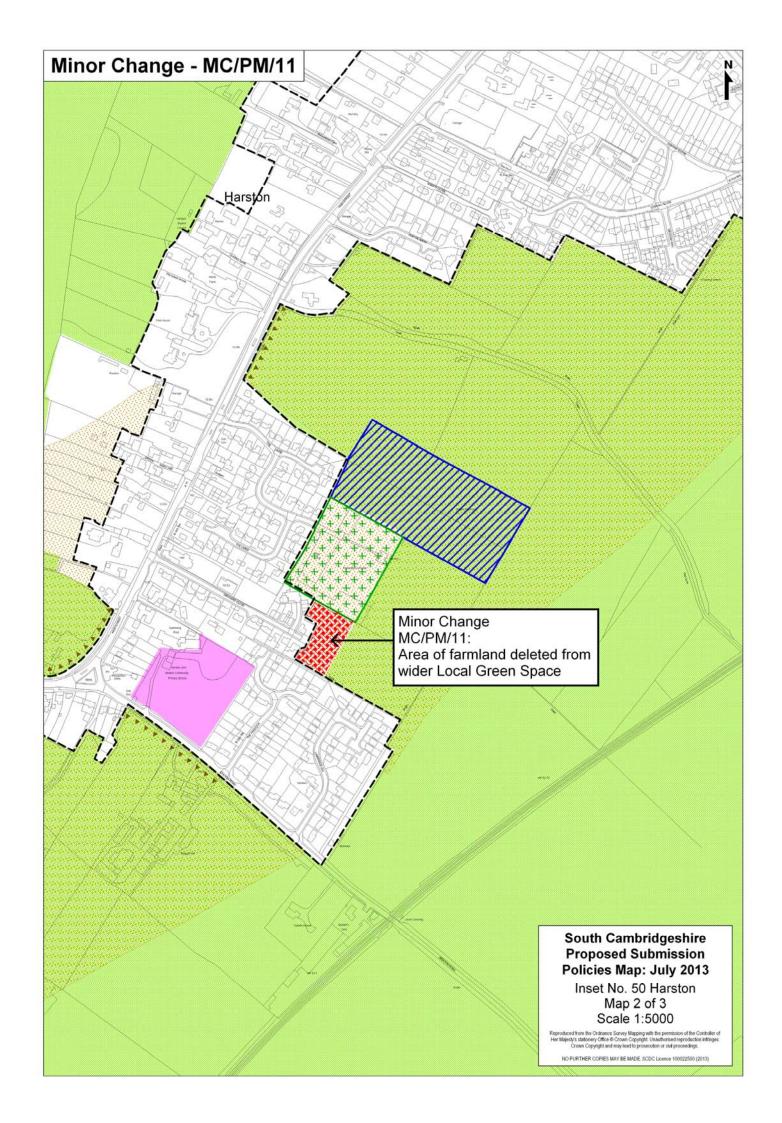


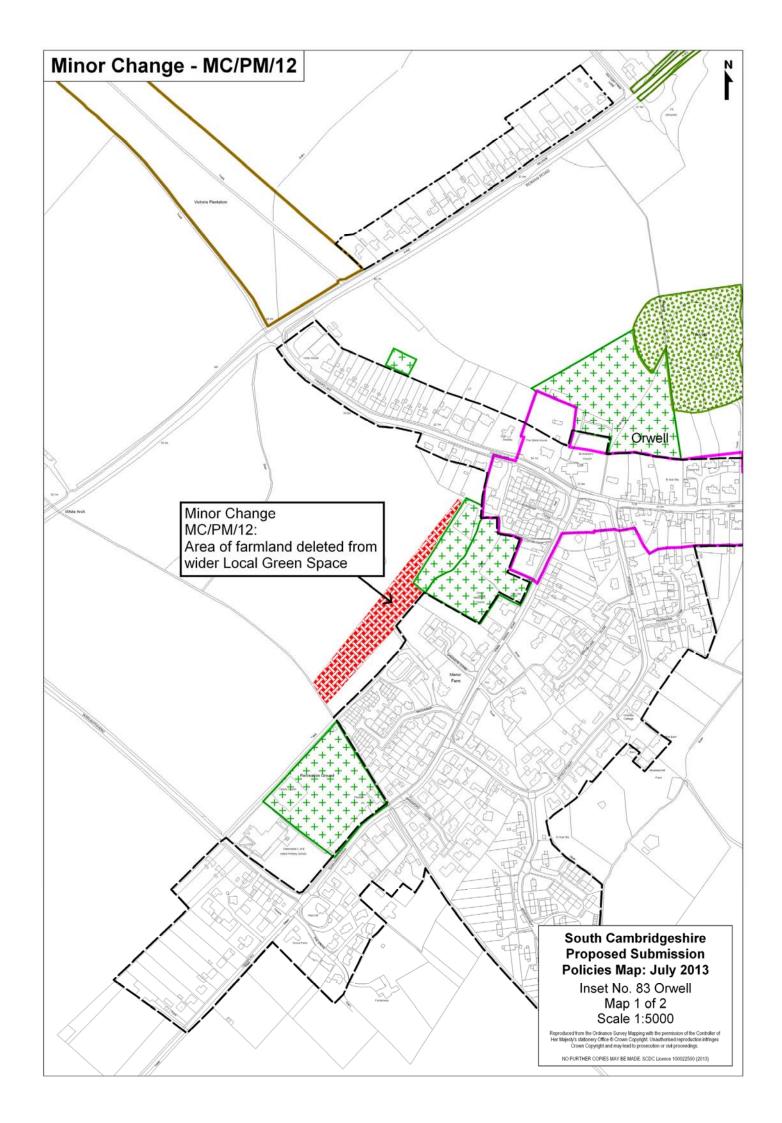


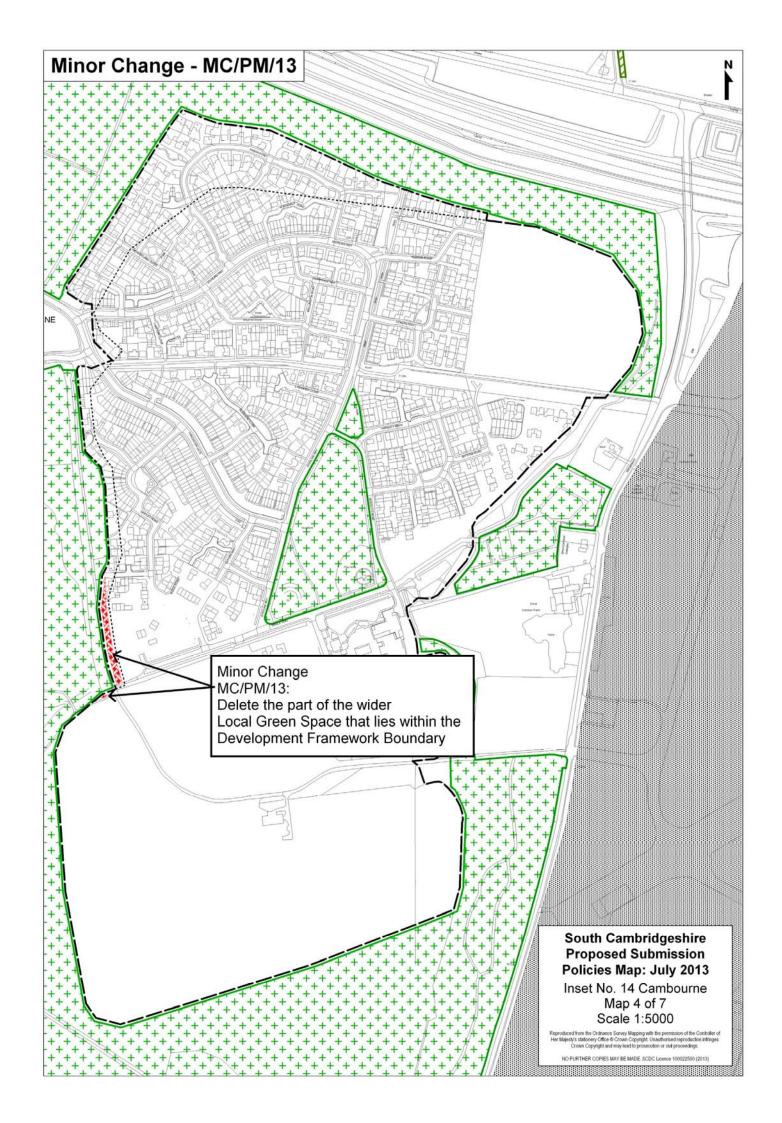












## **Appendix C: Key Issues and Assessment (Part 1)**

This Schedule provides a summary of representations received during consultation on the Proposed Submission Local Plan, an assessment of the issues raised, and the recommended approach to the Submission Local Plan.

Note: Part 2 which considers representations on Objection Sites has been bound separately.

In chapter order of the plan, each policy or section has a table which includes the following information:

- **Proposed Submission Representations Received** The number of representations received, and whether they were supports or objections.
- Main Issues A summary of the main issues raised in the representations, including identifying those from key stakeholders
- Assessment An assessment of the issues raised.
- Approach in Submission Local Plan The recommended approach to the Submission Plan. This is either 'No Change', a 'Minor Change', and in a small number of cases a 'Major Modification' (these have been listed in appendix A and B)

The schedule has been produced in a form to add to the audit trail that has been created throughout the plan making process for the Local Plan. The audit trail is Annex A of the Draft Final Sustainability Appraisal and also forms part of the Statement of Consultation. The audit trail from previous stages can be viewed on the Council's website: <a href="https://www.scambs.gov.uk/content/draft-final-sustainability-appraisal-report-and-habitat-regulations-assessment-screening">https://www.scambs.gov.uk/content/draft-final-sustainability-appraisal-report-and-habitat-regulations-assessment-screening</a>

# **Proposed Submission Local Plan: Key Issues and Assessment**

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Con . North stowe Extension (paragraph 3.49)	U1

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# **Chapter 1: Introduction**

Dana arranha 4.4.4	
Paragraphs 1.1 – 1.2 Introductory paragraphs: The background to the plan, the evidence base and the	
consultation under	rtaken to prepare it
Duamanad	Total: 15
Proposed	
Submission	Support: 5
Representations	Object: 10
Received	<u></u>
Main Issues	Support
	<ul> <li>Guilden Morden and Haslingfield Parish Councils support for the plan.</li> <li>Comments from previous consultations have been taken into account.</li> <li>Suffolk County Council supports the plan and seeks on-going co-operation to ensure that the A14 and A1307 remain safe and support growth throughout the region.</li> <li>Linton Parish Council comments that the SHLAA procedure was thorough and well argued.</li> </ul>
	Object
	<ul> <li>Consultation</li> <li>After Issues &amp; Options 1 the Council announced that Bourn Airfield would not be pursued as a development site but would be consulted on purely for a stadium. Bourn Airfield was reintroduced into the Local Plan at the Proposed Submission stage without further consultation. This is undemocratic, unsound and possibly illegal.</li> <li>Changes made to documentation during consultation - led to confusion and brings into question whole process. Hastily prepared to meet government housing targets over-riding local views.</li> <li>Is there any evidence of changes made as a result of the first consultation?</li> <li>The consultation has little meaning as much of the plans is</li> </ul>
	<ul> <li>already a reality.</li> <li>Complete fullness and transparency should be maintained throughout this consultation period and during the period of presentation of the plan to the Inspector.</li> <li>Lack of liaison with transport planners, proposals to toll the A14 will increase traffic using the A428.</li> </ul>
	<ul> <li>The following definition must be made clear to the public in</li> </ul>

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the new consultation period and before the plan is submitted to the Inspector:

- o The availability of previous minutes.
- Newly emerging aspects of appendages to plan.
- o The 5 year land supply plan.
- o The meetings preceding this plan.

### **Evidence**

• SHLAA and economic estimates are flawed.

### Sites & Strategy

- Object to scale of development and lack of capacity of services and infrastructure.
- Method of selecting sites simply relies on developers putting forward ones they have options on and not providing homes where needed.
- Council failed to properly investigate suitability of other sites, in particular to South of Cambridge that would have been more sustainable and nearer the need.
- Council needs to address waste issues, and protect the countryside.

### **Decisions**

 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 even open to public scrutiny.

#### **Format**

• The Wildlife Trust comments that the policies map contains too much information – separate into a number of themed proposals maps.

### Assessment

### Consultation

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<sup>th</sup> June 2013.

The Council carried out two rounds of Issues & Options consultation, in Summer 2012 and Winter 2012/13. The first round of consultation included development site options and elicited a number of new sites some of which were included as additional site options in the second Issues & Options consultation. For the avoidance of doubt, this consultation and new sites were variously described as:

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"(The consultation) looks at new issues and additional site options for development in South Cambridgeshire" on the Exhibition Boards.

"New options for supporting up to 30,000 new jobs being created in the district were suggested during a public consultation in the summer, and this consultation seeks residents' views on **extra options for housing sites** and where a possible community stadium could be located." In the press release.

"This (consultation) builds on the summer consultation by seeking views on further site options for development and areas to be protected." In the letter sent to everyone (including Parish Councils) who made representations during Issues & Options 1 consultation.

In the 13 December 2012 Committee report agreeing the Issues & Options 2 consultation, under the heading "Part 2 – Further Site Options in South Cambridgeshire arising from the first Issues and Options consultation" as "Further site options in addition to those already consulted on are included in Part 2 for a range of issues."

The Council therefore made it very clear in a variety of ways that the Issues and Options 2 consultation did not in any way indicate a 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. There were only ten additional housing sites consulted on during Issues and Options 1, which were all relatively modest village scale sites and not comparable with the 52 site options in the first consultation, or capable of replacing them.

Not all options in either Issues & Options consultation have been included in the plan. For example, site options in Bassingbourn, Comberton, Cottenham, Fulbourn, Gamlingay, Girton, Histon, Linton, Melbourn, Sawston, Swavesey, Waterbeach and Willingham were not taken forward into the Local Plan.

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. It concerned transferring into the SHLAA, evidence base document information relied upon by the Council when it made the decision to propose a new village at

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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. 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 to ensure all such information was included in the SHLAA and it was 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 sent letters/e-mails advising what had happened and that the consultation period was being extended. A public notice was put in the press and the exhibition material was amended. The changes had no bearing on the Local Plan document or its proposals, which were unchanged.

The Council has been very clear from the outset that the Local Plan review is an update of the current Local Development Framework (LDF), incorporating its unimplemented proposals and adding new ones to extend the period covered by the Local Plan from 2016 to 2031. The current LDF was found sound by planning inspectors as recently as 2010 and still has, for example, proposals for about 14,000 houses in allocations most of which now have planning permission (e.g. Trumpington Meadows, the North West Cambridge (University) site, NIAB2 (also known as Darwin Green) and Northstowe).

The Council's plan-making processes are open and transparent. All decisions are made in public by the Portfolio Holder, Cabinet or Council where members have comprehensive reports on all matters bearing on the plan (including this report). All reports, agendas, minutes and supporting documents are publicly available.

There has been close working with the County Council as highways authority throughout the plan-making process. A joint member group (the Cambridge and South Cambridgeshire Joint Transport & Spatial Planning Group) has met regularly to ensure that plans are joined up. On behalf of the two District Councils, the County Council has also commissioned transport modelling of the plans proposals. At the same time the County Council has been

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preparing and consulting on an overarching transport strategy for Cambridge and South Cambridgeshire.

Proposals for tolling the upgraded A14 were explored by the Highways Agency for national policy reasons. Following public consultation, the Government has decided not to proceed with tolling.

### **Evidence**

The National Planning Policy Framework (NPPF) requires each District Council to plan to objectively identify and then meet the housing, business and other development needs of the area. The housing and employment forecasts for the Local Plan have been produced in accordance with national guidance.

### Sites & Strategy

The National Planning Policy Framework (NPPF) requires each District Council to plan to objectively identify and then meet the housing, business and other development needs of the area. Availability of capacity in services and infrastructure can be a material planning consideration and has helped frame the proposals in the Local Plan. Where the Local Plan includes proposals for which new services and infrastructure are required, planning permission will require provision which will be funded by a mix of developer funding, funding from service and infrastructure providers and national funding streams, e.g. City Deal and the Local Growth Fund.

One of the four tests of the 'soundness' required of a Local Plan is that it is effective. Effective is defined in the NPPF as deliverable over the plan period. The NPPF provides advice that sites should be available, offer a suitable location for development, and be achievable with a realistic prospect that housing will be delivered on the site. If sites are not deliverable then the Council runs the risk that during the period covered by the new plan that it will not have a 5 year supply of deliverable housing sites. To ensure that the Local Plan would include sites which landowners would release for development and which developers considered suitable, the Council issued a 'Call for Sites' in the summer of 2011. This and additional sites which came forward during the two rounds of Issues & Options consultation elicited 338 sites spread across the whole District (including possible sites for new towns in the north and south of the District), capable of delivering 92,500 dwellings. Through the Local Plan the Council was looking for sites for 5,000 dwellings in addition to the 14,000 homes already with permission or in the adopted Local Development Framework.

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Protecting the countryside is an important national and local policy aim. The Local Plan seeks to protect the countryside from encroachment. This is achieved, for example, by making the best use of previously developed (brownfield) sites and by focussing development into the larger villages in the District. This means the tranquillity of the countryside will be less disturbed than by scattering development in the countryside and smaller villages, where most day to day needs of residents would require travel mostly by car to larger villages and towns.

Waste planning is the responsibility of the County Council who have been consulted throughout the preparation of the Local Plan.

#### **Decisions**

Decisions on the Local Plan have been taken in accordance with the Council's constitution. Wider member participation was important and was achieved through holding a number of workshops to which all members of the Council were invited, notes of which are published on the Council's website pages relating to the Issues and Options consultation.

### **Format**

The Local Plan regulations require that all policies and proposals are contained on a single Policies Map with Inset Maps where greater detail is needed. This is the format that the Council has relied upon. We will however look again at the choice of symbols, tones and other annotations to see if greater clarity can be secured when the Local Plan is adopted.

### Conclusion

The preparation of the Local Plan complies with the spirit of public involvement and the Council's aim to be a listening Council. It also complies with the legal and procedural requirements of plan-making and the Council's Statement of Community Involvement. The Proposed Submission Local Plan has a sound evidence base, there has been cooperation in particular with Cambridge City Council and Cambridgeshire County Council and there have been three rounds of public consultation on issues and options and the proposed plan. The Local Plan is procedurally ready for submission to the Secretary of State.

Approach in Submission Local Plan

No change

What the plan does and how it is prepared: (Paragraphs 1.9 – 1.12)

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Proposed	Total: 2
Submission	Support: 2
Representations	Object: 0
Received	
Main Issues	Support
	The Wildlife Trust supports commitment to protect and
	enhance the natural environment.
	Oakington & Westwick Parish Council supports the Local Plan taking forward Parish Council proposals which do not conflict with the strategy.
Assessment	Support noted for the approach in the Proposed Submission Local
	Plan.
Approach in	No change
Submission	
Local Plan	

What happens next (Paragraph 1.15)	
Proposed	Total: 16
Submission	Support: 0
Representations	Object: 16
Received	
Main Issues	Object
	Consultation Process
	The Council isn't listening.
	<ul> <li>Advance notice of proposals should have been posted to objector's address.</li> </ul>
	Exhibitions not held at times convenient for all, e.g. rail commuters.
	Poor availability of evidence documents.
	Making representations
	Problems with the online consultation system.
	Difficulties logging into the online system – paper representation sent instead.
	Form is the same structure you used for previous consultations and was complained about at the time.
	Form is excessively long and complicated to convey simple messages.
	<ul> <li>Questions are biased to receive the response you wish for self-justification.</li> </ul>
	Form is clearly designed to discourage members of the public

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- from submitting views different from your own.
- Consultation fails to conform to the "plain English" policy adopted by all local government organisations.
- Any comment from a member of the public has to be legally justified for their representation to be registered.
- Not qualified to comment whether the Local Plan has been lawfully prepared.
- Structure of your consultation prevents the free expression of views in that it expects comments paragraph by paragraph rather than by overall topic.
- No opportunity to respond to the plan as a whole in a single place.
- Authors of all representations will be made public, which is unreasonable in itself, and a threatening message in red is displayed each time a comment is made.

### **Assessment**

### **Consultation Process**

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 focussed into larger villages, new villages or new towns. Many village site options included in the two rounds of Issues & Options consultation have not been included in the new Local Plan but this has meant that objections have inevitably been focussed onto the small number of large site proposals (e.g. Waterbeach, Bourn Airfield and west of Cambourne).

Anyone making representations at any stage of the Local Plan is subsequently notified by letter or e-mail of future plan-making stages – new rounds of public consultation or key decisions such as adoption.

Exhibitions were held between 2.30pm and 7.30pm during the proposed submission consultation. This timing was carefully chosen based on many years of holding Local Plan exhibitions in South Cambridgeshire and experience of the time which is convenient to the vast majority of residents. In addition to a permanent exhibition at South Cambridgeshire Hall, the Council's website also hosted a virtual exhibition for anyone who could not attend an exhibition or who preferred the web for find out more information. Officers were also available during extended working hours for telephone callers.

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Evidence documents have been available on the Council's website from the date that they were published. Evidence documents were also available at each exhibition.

### **Making Representations**

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 with every endeavour made to request the information requested in the PAS/PINS form 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.

When the Inspector comes to examine the Local Plan, the assessment will follow the approach set out in the National Planning Policy Framework (NPPF) which includes whether the plan has been prepared in accordance legal and procedural requirements. The form included the opportunity for anyone making representations to say that they considered that the Council had not complied with the legal requirements but all aspects of making a representation were optional so those who did not feel able to comment did not have to. On 771 representations, this box was ticked to say the Local Plan was legally compliant. On 2,368 representations this box was ticked to say the Local Plan was considered not to be legally compliant. Any elaboration would have been included in the main body of their representations.

The Inspector will have to decide whether the Local Plan as submitted is sound. If he/she decides that any part of it is not sound then he/she will recommend the deletion or amendment of specific paragraphs, policies and proposals. To be most effective, representations therefore needed to be specific about what changes an objector was seeking. The online and paper forms provided scope for elaboration which could include free expression of views or a response to the plan as a whole if that is what was wanted. Phone numbers for the Planning Policy team were included on all material for anyone wanting assistance.

The Council is required by law to be open and transparent in the decisions that it makes. This includes making known the identity of those seeking to influence its decisions. As this information would be published, the Council deemed it necessary as a courtesy to advise anyone intending to make a representation that these

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	details would be made public.
	Conclusion  Around 37,000 representations were made during the 3 rounds of public consultation for the new Local Plan. The consultation process seems to have been quite successful. The Local Plan is procedurally ready for submission to the Secretary of State.
Approach in Submission Local Plan	No change

Paragraph 1.17	
What comprises the Development Plan for South Cambridgeshire	
Proposed	Total: 1
Submission	Support: 0
Representations	Object: 1
Received	
Main Issues	Object
	Cambridgeshire County Council seeks correction to
	references the date of adoption of its Minerals and Waste
	plans.
Assessment	This will be corrected.
Approach in	Minor change
Submission	
Local Plan	Amend the sixth bullet point of paragraph 1.17 to read:
	'Cambridgeshire Minerals and Waste Local Development
	Framework 2011 - Core Strategy and Proposals Map C 2011
	and Site Specific Proposals Plan and Proposals Map A and B
	<u>2012.</u> '

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# **Chapter 2: Spatial Strategy**

Paragraphs 2.1 to	2.11: Introductory paragraphs
Proposed Submission Representations Received	Total: 8 Support: 2 Object: 6
Main Issues	Support
	Support for strategy.
	<ul> <li>Object</li> <li>Paragraph 2.8 indicates phase 1 of Northstowe has planning permission, but the S106 has yet to be signed so this is misleading.</li> <li>Enforce collaboration between South Cambs and Cambridge and actively work to save green belt areas.</li> <li>In the plan a completely unrealistic estimate of employment opportunities has been made. The vast majority of people who might live on Bourn Airfield site would be commuting into Cambridge NOT being employed locally.</li> <li>Evidence base on employment is flawed, need for new employment land on edge of Cambridge (Cambridge</li> </ul>
Assessment	South).  It is agreed that the reference to the first phase of Northstowe having been granted planning permission in 2013 is not accurate and it was a resolution to grant permission subject to a section 106 agreement. The legal agreement has now been finalised and once signed the planning permission will be issues. A minor modification is proposed to clarify that permission was granted in 2014 which will be the case once the plan is finalised.  There has been close cooperation between the Council and Cambridge City Council throughout the plan making process (see Duty to Cooperate below, paragraphs 2.12 and 2.13). Both Councils' plans give significant weight to protecting the Green Belt setting of the historic city. Only limited additional Green Belt releases are proposed (see Policy S/6).
	The Local Plan does not intend that Bourn Airfield will be self sufficient in jobs. The development strategy for Cambridge and South Cambridgeshire aims to locate new homes as close to the main concentration of jobs in and on the edge of the City as possible. Having comprehensively reviewed the Green Belt in the last Cambridge Local Plan and the Local Development Framework, the preparation of this Local Plan has found that new development opportunities on the edge of Cambridge are limited. Developments such as Bourn Airfield close to the outer boundary

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	of the Green Belt are the next most sustainable location which will keep to minimum the distances travelled and being a new village will enable good quality bus services to be provided.
	The employment evidence base is addressed in chapter 8.
Approach in	Minor change
Submission	
Local Plan	<ul> <li>Amend new settlement bullet of paragraph 2.8, as follows:</li> <li>'Northstowe – new town of 9,500 homes, first phase of which was granted planning permission in 2013 2014, for 1,500 homes and a development framework plan for the whole new settlement agreed at the same time. It is expected that'</li> </ul>

Paragraphs 2.12 and 2.13: Duty to Cooperate	
Proposed Submission Representations Received Main Issues	Total: 13 Support: 1 Object: 12  Support  North Hertfordshire District Council – No strategic
	<ul> <li>issues requiring detailed discussion.</li> <li>Object         <ul> <li>Central Bedfordshire Council – Raise potential unmet housing need in the area and the possible role for South</li> </ul> </li> </ul>
	Cambridgeshire in accommodating some of that need. Currently intend to meet Gypsy and Traveller need within district, but if cannot would seek to work collaboratively with adjoining districts.  • Hertfordshire County Council - Concerned that dialogue
	regarding transport issues has not taken place and therefore remains concerned about the potential implications of the Local Plan on the Hertfordshire transportation network.  • Bourn Parish Council - SCDC did not consult strategically
	with all relevant local authorities. Views of local people have been ignored.  • Papworth Saint Agnes Parish Meeting – Important to
	<ul> <li>work with Huntingdonshire District Council, and other parts of subregion, particularly on transport measures.</li> <li>Memorandum of Understanding seeks to export Cambridge housing need to Peterborough, which is unsustainable. Not clear how the 2500 extra dwellings can be retrofitted into Peterborough's plan. Unrealistic that they will deliver sufficient housing.</li> </ul>
	Cooperation has not resulted in an effective joint strategy.

South Cambs has used different employment forecasts from Cambridge City, which impacts significantly on the plan.

- Cambridge and South Cambs did not cooperate fully, as South Cambs have not explored all brownfield development opportunities.
- No evidence of cooperation on the A14 plans.
- SHMA shows no evidence of cooperation with cooperation with Bedford, Hertfordshire or Essex.
- Important to work with surrounding areas when assessing needs.

### **Assessment**

The Council has worked with its neighbours throughout the plan making process. There has been close cooperation with all authorities in the Cambridge sub region housing market area and with Peterborough City Council, whose housing market area overlaps with it. Whilst there has been general cooperation with neighbours outside Cambridgeshire, there is no need for specific cooperation on the Cambridge Sub-Region SHMA with those areas, as they lie within a separate housing market area.

A Memorandum of Cooperation agrees that a small part of Fenland and East Cambridgeshire's identified need in the SHMA will be met in Peterborough. Those homes are already included in the adopted Peterborough Core Strategy that plans for above its own needs. The Local Plan meets the full identified objectively assessed needs for South Cambridgeshire as identified in the SHMA and the Memorandum of Cooperation, as required by the NPPF (see Policy S/5).

The Council has worked particularly closely with Cambridge City Council given the functional relationship between the two areas. This includes considering the most appropriate development strategy for the wider Cambridge area. There is no requirement that the Council considers all brownfield land. The plan makes the most of opportunities provided by brownfield sites where they are consistent with achieving a sustainable pattern of development (see Policy S/6).

Employment needs of the area have been considered in a coordinated way with the City Council (see chapter 8).

The Council has worked closely with the highways authorities. This includes with the County Council on the Cambridge and South Cambridgeshire Transport Strategy and the accompanying modelling report that support the Local Plan. Close working has and continues to also take place with the Highways Agency on the emerging plans for the A14 improvements, which are important for the delivery of the development strategy, but do not themselves

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Approach in Submission Local Plan	No change
	form part of the Local Plan.  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. Furthermore, Cambridgeshire County Council is working closely with Hertfordshire County Council on the Transport

to 2.17: Joint Spatial Approach to Cambridge and South
Total: 10
Support: 1
Object: 9
Support
Support policies which protect existing village frameworks.
<ul> <li>Object</li> <li>There has not been joined up planning. Cambridge city sprawl is being exacerbated by the intention to build on Green Belt sites. There are other options e.g. Barrington Cement Works.</li> <li>Green Belt development should be the last resort. No reason given why edge of Cambridge is considered most sustainable.</li> <li>Development at West Cambourne and Bourne Airfield is completely unsustainable.</li> <li>Green Belt should not be the determinant of planning strategy. Cooperation should have lead to the most sustainable strategy. Does not address imbalance of homes and jobs in Cambridge. Transport strategy has been led by planning strategy rather than the other way round.</li> <li>A Sustainability Assessment of Harbourne (North of Cambourne) in comparison with Bourn Airfield has not been carried out, the SEA is therefore flawed.</li> </ul>
There has been close joint working with the City Council, including
on the development strategy and the appropriate approach to the
focus of development in the Councils' new Local Plans throughout the plan making process. This included coordination of issues
forming part of the Councils' first Issues and Options consultations
and a joint Part 1 document in the Issues and Options 2

consultation. These were supported by joint evidence documents, such as the Cambridge and South Cambridgeshire Sustainable Development Strategy (2012) and the Inner Green Belt Study Review (2012).

The review of the development strategy tests the sequence for development and explains why the edge of Cambridge remains the most sustainable location for development in terms of accessibility to jobs, services and facilities. The Issues and Options 2 Joint Part 1 consultation specifically asked what the appropriate balance is between the locational merits of the edge of Cambridge and the importance of protecting the Green Belt setting of Cambridge as an important historic city.

The transport implications of the different strategy options were tested through transport modelling during the evolution of the development strategy in the Cambridge Sub Regional Transport Modelling Report for Cambridge and South Cambridgeshire Local Plans (2013). This informed the preparation of the development strategy. The sustainability appraisal undertaken jointly by the two Councils informed the conclusion that the accessibility benefits of edge of Cambridge locations do not override the Green Belt importance of the majority of the edge of Cambridge sites, and that new settlements will enable significant transport improvements to be focused on two corridors to deliver high quality public transport and create more sustainable developments than the alternative of development in villages. 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 joint Inner Green Belt Study Review 2012 identified a small number of areas that could be released from the Green Belt without fundamental harm to its purposes and these areas are proposed to be allocated for development (see Policy S/4). The land north of Cambourne was considered through the SHLAA and tested through the Sustainability Appraisal. It was assessed against the sustainability objectives in the same way as all the other sites considered through the plan making process. All new settlement sites put forward to the SHLAA were shown together in the table contained in Annex Bm of the Sustainability Appraisal so that their relative performance could be easily compared. The reasons for rejection of the site are also captured in the SHLAA appraisal.

Approach in Submission Local Plan

No change

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

Paragraphs 2.18 Cambridgeshire	to 2.19: The Transport Strategy for Cambridge and South
Proposed Submission Representations Received	Total: 17 Support: 3 Object: 14
Main Issues	Support
	<ul> <li>Cambridgeshire County Council - The development strategy set out in the Local Plans, with growth primarily focused on Cambridge, Waterbeach Barracks, West Cambourne and Bourn Airfield leads to more sustainable transport patterns overall than options with more dispersed growth across South Cambridgeshire.</li> <li>Highways Agency - The evidence reviewed to date gives some level of comfort and it is recognised that a lot of work has been undertaken to consider local and strategic transport impacts, as well as identify potential schemes that could address these impacts. Noted that there is currently a significant funding shortfall.</li> </ul>
	Object
	<ul> <li>English Heritage – Transport infrastructure could be damaging to the historic environment. Status of the transport plan should be clarified. Should make commitment to consider impact on historic environment, and seek enhancement.</li> <li>Harlton Parish Council – Inadequate links in the plan to the transport plan.</li> <li>Transport strategy only published with the submission plan. Decision to build homes was made without a strategy in place.</li> <li>Only assesses the scope to mitigate transport implications of plan content. Does not assess scope to deliver good transport.</li> <li>Green Belt development exacerbates road problems in Cambridge.</li> <li>Edge of Cambridge sites have better transport options than Bourn Airfield, and result in better modal share of cycling and walking.</li> <li>Need more investment in Cycle lanes.</li> <li>Large funding gap for transport measures proposed.</li> <li>Evidence base in respect of highway and traffic impact is incomplete. No transport modelling of concentrating development on edge of Cambridge. Decisions taken in advance of testing the impacts of the strategy.</li> <li>Strategy fails to take account of existing transport infrastructure e.g. at Trumpington.</li> </ul>

## No evidence to demonstrate Bourn Airfield is more sustainable than Cambourne North proposal. **Assessment** There has been close working with the County Council on transport matters throughout the plan making process. The transport implications of the different strategy options were tested through transport modelling during the evolution of the development strategy in Cambridge Sub Regional Transport Modelling Report for Cambridge and South Cambridgeshire Local Plans (2013). This informed the preparation of the development strategy. The modeling identified that the main transport impacts will be as a result of existing patterns of development and planned developments in adopted plans. It is only the additional development that the plan can influence. The benefits of edge of Cambridge locations in terms of accessibility have always been acknowledged but when weighed against the significant Green Belt harm identified and tested through the sustainability appraisal, it was concluded that land on the edge of Cambridge should not be identified for development as part of the strategy included in the plan. The modelling looked at the relative performance of new settlements compared with dispersed village development. The focus of housing in new settlements on two corridors provides opportunities to deliver high quality public transport improvements. This will create sustainable developments with far higher mode shares by non car modes than more dispersed development (the modelling shows 6-7% in new settlements compared with 2% through village focused development). This supports the plan focus for the additional element of the development strategy being through strategic scale developments focused on key corridors with more limited rural development. 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.

Comparing the Development Strategy to 2031 with the Structure Plan (Paragraphs 2.20 and 2.23)	
Proposed	Total: 5
Submission	Support: 2
Representations	Object: 3
Received	

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

No change

Approach in

Submission Local Plan

Main Issues	Support
	Steady increase in homes in built up areas welcomed.
	Not clear how much development is in Green Belt, or on Previously Developed Land.     Tables illustrating comparison with structure plan double count the same urban extensions.
Assessment	The Local Plan strategy makes best use of available brownfield land in suitable locations as part of a sustainable development strategy. No specific calculation is included. It is recognised that in a largely rural area the availability of brownfield land is limited and some such sites are remote from services and facilities. A number of the strategic development sites include significant areas of brownfield land, including the new settlements at Northstowe, Waterbeach Barracks and Bourn Airfield.  The tables provide an appropriate comparison of previous and new
	spatial strategies taking each version of the strategy as a whole.
Approach in	No change
Submission	
Local Plan	

Policy S/1: Vision (and Paragraphs 2.24 and 2.25)	
Proposed Submission	Total: 12 Support: 7
Representations Received	Object: 5
Main Issues	<ul> <li>North Hertfordshire District Council - overarching vision of your plan seems to be well considered.</li> <li>Environment Agency – Support vision of a green environment</li> <li>Natural England – Generally welcome this section.</li> <li>Important to balance demands of development with the quality of existing environment.</li> </ul>
	<ul> <li>Object</li> <li>'continue to be the best place to live, work and study' is a subjective statement.</li> <li>Growth can never be sustainable given planet of finite resources. Should not be trying to get more people to live here.</li> <li>Development strategy west of Cambridge conflicts with the vision.</li> <li>Plan will not provide sufficient support for high tech industries. Vision should refer to meeting the need for</li> </ul>

	development for continued economic and social success of district.
	district.
Assessment	The Vision reflects the Council's corporate vision for the district.
	Part of the vision is to provide sustainable economic growth. How
	that is achieved is a matter for other parts of the plan.
Approach in	No change
Submission	
Local Plan	

Policy S/2: Objecti	ves of the Local Plan (and Paragraph 2.26)
Tolley 0/2. Objecti	ves of the Local Flam (and Faragraph 2.20)
Proposed Submission Representations Received	Total: 116 Support: 65 Object: 51
Main Issues	<ul> <li>Support</li> <li>Environment Agency – Support objectives, particularly b.</li> <li>Natural England – Welcome policies which seek to ensure that development will protect and enhance the natural environment</li> <li>Sound objectives which will benefit current and future residents.</li> <li>New developments must take into account the community that is already in place.</li> </ul>
	<ul> <li>Cambridgeshire County Council – Should reference meeting infrastructure needs of existing communities as well as new developments.</li> <li>Bourn Parish Council - SCDC has been inconsistent in its response to consultation feedback and has failed to capture local aspirations in the draft Local Plan. Fails to deliver the localism agenda.</li> <li>Objectives should highlight role of previously developed sites.</li> <li>Objectives not met by Bourn Airfield.</li> </ul>
	Objective A Support  • Supports South Cambs' strengths.
	Should reference making land available for these industries.
	Objective B Support  • Wildlife Trust – support

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

Built and natural heritage should be protected.

### Object

- **English Heritage** should reference the historic Environment.
- Protecting the Green Belt should have its own objective.
- Local Plan does not protect the Green Belt.
- Should emphasise that development should enhance the character of the area.
- West Cambourne and Bourn airfield will not achieve this objective.
- Encouragement should be given to developing previously developed land.

### **Objective C**

## Support

- Need affordable housing.
- Sustainability is the key word.

### **Object**

- Will not be met as insufficient development is planned in villages. It unnecessarily constrains development in sustainable villages.
- Fails to consider inter-dependency between villages.
- Will not deliver sufficient sites in sustainable locations i.e. the edge of Cambridge.
- West Cambourne and Bourn airfield will not achieve this objective.
- Should refer to meeting identified housing requirements.

### **Objective D**

### Support

Support objective to deliver high quality.

### **Object**

- Should support the delivery of renewable energy
- Seek more variety of homes, more parking, larger gardens

### **Objective E**

### **Support**

- Cambridgeshire County Council the location of new development in relation to services and facilities is important in ensuring jobs and key services are available to all.
- Important. New development should not be built if it places a strain on facilities.

### **Object**

• Cambridgeshire County Council – include libraries in list

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	of facilities.  RSPB – add word 'appropriate' before local open space and green infrastructure, accompanied by an explanation in the supporting text that open and green space should be appropriately planned to avoid indirect recreational disturbance impacts to sites of importance for nature conservation.  Should refer to existing development as well as new development.  Should refer to pubs.  Facilities in Cambourne are full.  Objective F Support  An important consideration.  Object  Add horse riding.  Dispersal strategy of the plan will not meet this objective.  Bourn Airfield and Cambourne have no public transport provision. Focus development where there are the best transport links.  Employment sites in Cambourne have been removed.
Assessment	It is important that objectives for the Local Plan are high level and aspirational, and focus on the goal to be achieved. A number of representors seek changes which suggest policy approaches. How the objectives are achieved, such as through specific policy measures, is addressed elsewhere in the plan. As such no
Approach in Submission Local Plan	No change

Policy S/3: Presur 2.27)	mption in Favour of Sustainable Development (and Paragraph
Proposed	Total: 30
Submission	Support: 22
Representations	Object: 8
Received	
Main Issues	<ul><li>Support</li><li>Support for sustainable development.</li></ul>
	Bourn Parish Council - agrees that future development should focus on re-use of previously developed land in sustainable locations, where land is not of high environmental value, but needs to be clearer when

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

Assessment	<ul> <li>brownfield site is predominantly farm land.</li> <li>Policy could be used as a lever for inappropriate development. Should clarify only applies when proposals conform to local plan and its objectives.</li> <li>Does not fully reflect NPPF paragraph 12, that applications for planning permission that conflict with an up-to-date plan should be refused.</li> <li>Policy adds additional caveats to NPPF paragraph 14 which should be deleted. It refers to "material considerations indicate otherwise" - not part of NPPF test. Two tests in NPPF will be "[taken] into account", suggesting importance will be downplayed.</li> <li>Policy should also include a commitment to approve planning applications without delay, so as to be consistent with proposed policy for the Cambridge Local Plan.</li> <li>Development should always be sustainable. The wrong sites have been chosen in the plan.</li> <li>The policy is drawn from the National Planning Policy Framework and the model sustainable development policy provided by the Planning Inspectorate for inclusion within all local plans. This policy, alongside the other policies contained within the draft South Cambridgeshire Local Plan, will ensure that all new development in the district meets the principles of sustainable development.</li> <li>The Local Plan should be read as a whole, and this policy will be considered alongside all the other policies in the plan.</li> <li>Reference to 'unless material considerations indicate otherwise' forms part of the Planning and Compulsory Purchase Act 2004, and is a key consideration when assessing plan applications. It is therefore reasonable that it is referenced in the policy.</li> <li>Reference to applications being determined without delay is superfluous.</li> </ul>
Approach in	No change
Submission Local Plan	

Policy S/4: Cambridge Green Belt (and Paragraphs 2.28 to 2.33)	
Proposed	Total: 220
Submission	Support: 70
Representations	Object: 150
Received	
Main Issues	Support
	Natural England – Welcome this policy.
	English Heritage - supports the commitment to ensuring
	that the setting and special character of Cambridge is

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

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- protected.
- Harlton PC, Barton PC, Fulbourn PC support for continuation of protection of the Green Belt.
- **Fen Ditton PC** Green Belt in and around village should remain.
- Haslingfield PC Should be no further encroachment into Green Belt to west of Hauxton Road on either side of M11.
- Oakington and Westwick PC Green Belt land should not be used for development.
- Green belt land needs to be protected, important for character of the City and the economy.
- Should be no development in the Green Belt around Fen Ditton.
- Should be protected around Fulbourn.
- Support the retention in the Green Belt of the small parcel of land in Home End, Fulbourn.
- Development should only be in exceptional circumstances.
   Support conclusion that community stadium does not provide this exception at Trumpington Meadows.
- Support for the extension of the Green Belt between Waterbeach village and the New Town site.

### Object

- **Great Shelford PC** pleased that no sites identified around village, but policy should be strengthened to provide greater protection.
- Wildlife Trust Object to lack of emphasis on enhancement of the Green Belt.
- Policy needs to be elaborated on to present a more positive context
- Save the Cambridge Green Belt No further development in the Green Belt. Petition of 2,242 signatures requests that both South Cambridgeshire and Cambridge City Councils withdraw all sites in Green Belt proposed in the Plans. .
- Exceptional circumstances to review the Green Belt do not exist because alternative sites are available.
- Plan will cause urban sprawl, merging villages with Cambridge.
- Make use of Brownfield before using Green Belt. Council has not searched for all available sites before proposing Green Belt development.
- The use of criteria based on quality or value against which to assess sites is not supported by the NPPF.
- No clear and compelling case presented as to why the Impington site has been selected for development.
- Further development between Huntingdon and Histon Roads will compromise separation to Girton.
- Use poor greenbelt between NIAB and the A14 to a much

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

- greater extent that proposed
- The purposes of the Cambridge Green Belt should be changed to accord with those in the NPPF:
- Choose the best sites to build new developments regardless of the green belt.
- Green Belt has been incorrectly treated as an absolute constraint.
- Insufficient evidence that impact on sustainability has been considered when reviewing the Green Belt.
- No Green Belt review carried out for the rural area.
- Review is needed if sustainability objectives are to be met, and critical supporting infrastructure to the city is to be delivered.
- Green Belt boundary in the plan will not offer permanence due to future development needs. A proper safeguarding assessment has not been undertaken.
- Safeguarded land should be available for development, and the airport is not.
- Cambridge Airport should be returned to the Green Belt.
   Can be reassessed if becomes available in the future.
- WATERBEACH Objection to Proposed extension to Green Belt north of Bannold Road. Land does not contribute to Green Belt purposes. Barracks are already linked to village by built development. No mention of Green Belt at Issues and options, which identified sites with development potential.

### Edge of Cambridge Green Belt strategic objection sites:

- CAMBRIDGE SOUTH Development could take place without significant harm to the purpose of including land in the Green Belt. Hauxton Road, the M11 and the River Cam corridor would provide boundaries that will endure and be permanent.
- CAMBRIDGE SOUTH EAST Review green belt to facilitate development.
- LAND NORTH OF BARTON ROAD Land previously released on edge of Cambridge equally sensitive in landscape terms. Remove from Green Belt and allocate for development.
- LAND TO SOUTH OF BARTON ROAD Land previously released on edge of Cambridge equally sensitive in landscape terms. Remove from Green Belt and safeguard for development after 2031.
- LAND WEST OF HAUXTON ROAD, TRUMPINGTON should be released from the Green Belt, and along with land at the Abbey Stadium, Newmarket Road (in Cambridge City Council's area) be allocated to meet the need for new homes and sports facilities. Needed to deliver

- critical infrastructure identified in supporting studies.
- FEN DITTON Land should be released from Green Belt to accommodate development.

### Other Green Belt objection sites:

- BABRAHAM RESEARCH CAMPUS capacity to deliver new specialist research and development floorspace at Babraham. Land should be removed from Green Belt.
- GIRTON Girton College should be released from the Green Belt.
- GIRTON South side of Huntingdon Rd area no longer performs green belt functions (also seeking change to Development Framework).
- GIRTON Land at Howes Close/Whitehouse Lane should be released from the Green Belt and allocated to meet Anglia Ruskin's need for student residential accommodation. Can be development without significant impact on approach to City.
- GREAT ABINGTON Former A11/A505 junction area should be reviewed to correct historic anomaly.
- GREAT SHELFORD Scotsdales Does not warrant Green Belt status (also seeking change to Development Framework).
- HARSTON Land at Royston Road Green Belt does not follow natural boundaries.
- HARSTON Harston south west area bounded by River Rhee, Haslingfield Road / Church Street and Mill Road, infilling will not impact on Green Belt principles (also seeking change to Development Framework).
- HARSTON North of Haslingfield Road builders yard should be removed from Green Belt (also seeking change to Development Framework).
- HARSTON Button End existing development forms part of the village (also seeking change to Development Framework).
- HORNINGSEA Notcutts Garden Centre site Does not warrant Green Belt status (also seeking change to Development Framework).
- LITTLE ABINGTON land beside old A11 Land does not perform Green Belt purposes.
- MILTON Land East of A14 Milton Interchange site does not significantly meet the key functions of the Green Belt.
- WHITTLESFORD Wren Park remove boundary anomaly.
- WHITTLESFORD Syngenta Remove employment area from Green Belt, and include as Established Employment Area.

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

### **Proposals also seeking Housing Allocation at policy H/1:**

- FULBOURN Land at Court Meadows House off Balsham Road (SHLAA 213)
- FULBOURN land off Home End (SHLAA 214) circumstances have changed since site was designated as Green Belt.
- GREAT SHELFORD Land south of Great Shelford Caravan and Camping Club, Cambridge Road (SHLAA 188) – Disagree with the Councils assessment.
- GREAT SHELFORD Land east of Hinton Way, north of Mingle Lane (SHLAA 207) – Disagree with the Councils assessment.
- GREAT SHELFORD Land off Cambridge Road (SHLAA 005). Studies have shown area could be removed from Green Belt.
- HARSTON Land to the rear of 98 102 High Street
   (SHLAA 266) Site not visible from the wider landscape.
- HISTON Buxhall Farm (SHLAA 113) Needed to accommodate development, SHLAA suggested site was not constrained.
- HISTON Land to the West of 113 Cottenham Road (SHLAA 306) – development would not have adverse impact.
- HISTON Boundary change north of Impington Lane (Policy H/1 D) – Councils alteration is illogical as it does not follow physical features. Should allocate a larger area.

### Assessment

The policy has been carried forward largely unchanged from the Adopted Core Strategy DPD, where it was found sound through the examination. A specific function of the Cambridge Green Belt is to preserve the setting and special character of Cambridge as a historic town.

### **General Objections:**

Strength of the policy – Government attaches great importance to Green Belts and sets out strong policy guidance for them in the NPPF which does not need to be repeated in the Local Plan.

NPPF and Green Belt purposes – The stated purposes of the Cambridge Green Belt are consistent with those in the NPPF and have been derived from and included in a series of plans including the 1992 Cambridge Green Belt Local Plan (which itself drew on studies and reports going back to the 1930's), the 2003 Structure Plan, past Regional Planning Guidance and the adopted Core Strategy, all of which have been previously tested at examination. A common theme has been the importance of the Green Belt to the setting and special character of Cambridge as a historic city which includes the quality of its rural setting, necklace villages,

important views, green corridors, and soft green edge. In carrying out a review of the inner boundary of the Green Belt it is entirely appropriate that visual quality be considered to assist judgements to be reached concerning the significance and importance of land to the Cambridge Green Belt. The 2012 Inner Green Belt Boundary Study provides a robust assessment to inform plan making.

Enhancement – Policy guidance on the enhancement of the Green Belt is set out in the NPPF. Policy SS/2 in the Local Plan requires such enhancement on land retained in the Green Belt. Similar policies are to be found in the retained Area Action Plans for the Cambridge Southern Fringe and Cambridge East.

Development in the Green Belt and exceptional circumstances – The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances through the preparation of a Local Plan, and that in considering the case for alterations account should be taken of the need to promote sustainable patterns of development. Development in the urban area of Cambridge and on the edge of Cambridge in the Green Belt are the most sustainable locations for development in terms of accessibility to jobs and services and reducing emissions. However, the Green Belt immediately surrounding Cambridge also has an important environmental role in terms of historic heritage and protection of the setting and special character of Cambridge as a historic town, which is also important for sustainability. Given the need for jobs and homes in the area, it follows that if land on the edge of Cambridge and in Green Belt villages can be identified where the impacts of development on Green Belt purposes would be limited, then exceptional circumstances would exist to justify their release. The Council has not treated Green Belt as an absolute constraint. and indeed proposes some releases of land from the Green Belt for development, weighing in each case the sustainability merits of such locations with the significance of harm to the purposes of the Cambridge Green Belt.

A study of the Inner Boundary of the Green Belt was undertaken in 2012 by Cambridge and South Cambridgeshire Councils which identified a number of small sites on the edge of Cambridge that could be released for development with limited impact on Green Belt purposes. The 2012 study also found that large scale strategic development on the edge of Cambridge would have major adverse impacts on Green Belt purposes. The negative impacts of such developments on the environment in terms of the setting of Cambridge are considered to outweigh their economic, social and other environmental benefits as explained in the Sustainability Appraisal. Alternative development locations for strategic scales of

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

development have been identified beyond the outer boundary of the Green Belt. The Cambridge and South Cambridgeshire Local Plans include proposals for development of the land identified in the Green Belt Study Review, which for South Cambridgeshire are an employment allocation on Fulbourn Road adjacent to the Peterhouse Technology Park and a slightly larger site at NIAB3 (land between Huntingdon Road and Histon Road). See also Policy S/6: The Development Strategy to 2031.

A number of Green Belt sites at villages were also identified through the SHLAA where development would have limited impact on Green Belt purposes. This took account of the need for a robust and flexible development strategy with an element of village as well as strategic scale housing sites, and the fact that most of the largest and better served villages are located in the Green Belt. This also comprises exceptional circumstances. See Policy H/1: Housing Sites in Villages.

Urban sprawl and village merger – The small sites identified for release will not produce urban sprawl or lead to the merger of villages to Cambridge.

Use brownfield land first – The Sustainability Appraisal of sites has prioritised the development of brownfield land over greenfield sites where it is in appropriate locations and can contribute towards sustainable development. However, in a rural area without any significant urban areas a high proportion of greenfield development cannot be avoided. To identify potential development sites, and in advance of the publication of the draft guidance in the NPPG, the Council primarily relied on a Call for Sites (which yielded around 300 sites), which was backed up by a review of all potential development locations on the edge of Cambridge, as this lies at the top of the development sequence. A large number of additional sites across the district have been proposed in representations to the Issues and Options consultations and to the Proposed Submission Local Plan. It is considered that all reasonable options have been considered and it is very unlikely that any deliverable development sites have not thereby been considered. Overall the evidence base relating to potential development sites is considered to be adequate and proportionate.

Use of criteria in assessments – The NPPF does not rule out the approach followed to assess sites in the Green Belt.

Impington site – The Council has concluded that exceptional circumstances do exist to justify the release of sites for development as discussed above. The SHLAA concludes that a smaller site can be developed, with limited impact on Green Belt

purposes. A new defensible boundary will be created.

Girton separation – The Inner Green Belt boundary study 2012 and the SHLAA assessment find that development in this location if set back from the road would have a limited impact on Green Belt purposes.

Safeguarding – There is no requirement in the NPPF that safeguarded land should be available for development. The NPPF says that plans can identify areas of safeguarded land between an urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period and make clear that the safeguarded land is not allocated for development at the present time and can only come forward following a review of the Local Plan. The adopted plans for Cambridge and South Cambridgeshire include Cambridge East as a key element of the sustainable development strategy. Whilst the airport site is now not available for the plan period to 2031, the landowner has supported the safeguarding of the land. It is appropriate in the circumstances that the land previously removed from the Green Belt as not being essential to Green Belt purposes, but not available to meet development needs for the new plan period, is safeguarded for possible longer term development. The role of the land in a future development strategy for the Cambridge area can then be assessed in future plan reviews.

NIAB land – The Inner Green Belt Boundary Study 2012 concludes that major development in this location beyond that identified in the Local Plan would have significant adverse impacts on Green Belt purposes.

Bannold Road Waterbeach – Paragraph 82 of the NPPF allows for new Green Belt to be established in exceptional circumstances such as when planning for new settlements. At Issues and Options stage no decision had been reached on the form and scale of the Waterbeach development.

Local representations strongly support the separation of the existing village and the new town. If the sites are not given protection as Green Belt normal planning and development management policies would not be adequate to maintain their open character given their location and their suitability for residential development. Short term housing development on a small village scale should not be allowed which would compromise the success and sustainability of a strategic new town development which will help meet the housing needs of the District over a period extending beyond the plan period.

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The SHLAA assessment of site 155 concerning land north of Bannold Road, quotes an appeal decision from 1985 dismissing a small development in this location stating: "[The site] is separated from Waterbeach Barracks by a strip of arable land only some 200m wide and the Barracks itself is as extensive as a large village. It seems to me highly desirable that a wedge of open land should be retained between the 2 settlements to prevent their coalescence".

The long standing importance attached to the retention of a wedge of open land between Waterbeach village and the New Town remain relevant to the proposed designation of the land as Green Belt.

### Edge of Cambridge Green Belt strategic objection sites:

Main issues and assessments of these sites, including Green Belt issues, are contained in Annex A.

### Other Green Belt objection sites:

The NPPF is clear that the general extent of Green Belts is already established and should only be altered in exceptional circumstances - none of the following sites have demonstrated exceptional circumstances.

Babraham Research Campus, Girton College & Syngenta – It is not unusual to have areas of built development within the Green Belt. Being located within the Green Belt does not preclude appropriate development. Proposals can be considered through the planning application process as to whether site specific issues warrant exceptional circumstances within the Green Belt. The Green Belt boundary is considered sound.

Girton – South side of Huntingdon Road – The Green Belt boundary in this part of the district was reviewed during the preparation of the North West Cambridge Area Action Plan (AAP), adopted in 2009. The site was not removed from the Green Belt and the North West Cambridge AAP has been through inquiry and found sound.

The above site, together with Land at Howes Close / Whitehouse Lane, Girton, form a very important part of the separation between Girton and the edge of Cambridge.

Scotsdales Garden Centre - the site has been in the Green Belt since 1965, before planning permission for the garden centre was approved in 1969. Growth of site has taken place with the

Green Belt designation in place and there has been no material change in circumstances to warrant its removal. The inspector examining the Local Development Framework only recently concluded that the exclusion of this site from the Green Belt is sound as most of the site is occupied by open parking areas, outside storage, and grassed / landscaped areas and most of the structures are of the glasshouse type or have one or more open sides. The scale and nature of development do not constitute such exceptional circumstances as to warrant changing the Green Belt boundary.

Notcutts Garden Centre – The same principles as Scotsdales Garden Centre apply to this site (see above).

Great Abington – The former A11/A505 junction site forms the outer boundary of the Green Belt. The boundary has been drawn along the alignment of the old A11 road, which remains a clear and defensible boundary. The Green Belt boundary is considered sound.

Remaining sites – It is not unusual to have areas of built development within the Green Belt. Where sites contain buildings, it is low density and rural in character, not considered part of the built-up area. Many of these sites also sought a change to the village framework boundaries but having been assessed against the criteria, none of them met the criteria and no changes are proposed (see Policy S/7). The boundaries of the Green Belt are clear and long established.

## Proposals also seeking Housing Allocation at policy H/1:

For main issues and assessments of village objection sites, including Green Belt issues, see Annex B.

The sites have been assessed through the SHLAA and SA processes. The importance of land to Green Belt purposes was considered through these processes. Some of the sites were also consulted upon as Site Options in I&O 2012 or I&O2 2013. They have not been included in the Proposed Submission Local Plan as there were better site options to meet the development strategy.

Impington Lane site – see assessment for 'Impington site' under 'General objections'.

# Approach in Submission Local Plan

No change

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Policy S/5: Provisi	on of New Jobs and Homes (and Paragraphs 2.34 to 2.41)
Proposed	Total: 85
Submission	Support: 11
Representations	Object: 74
Received	,
Main Issues	Support
	<ul> <li>Cambridge City Council, Fenland District Council, St Edmundsbury Borough Council - welcome commitment to deliver 22,000 additional jobs and 19,000 new homes in the plan period, which is in line with the apportionment of homes across Cambridgeshire as agreed in the May 2013 Cambridgeshire and Peterborough Memorandum of Co-operation.</li> <li>We desperately need more homes to increase supply and keep housing affordable. 19,000 homes is a MINIMUM.</li> <li>Support planning for the objectively assessed need.</li> </ul>
	<ul> <li>Haslingfield Parish Council – Concerned that targets are overly large and based on previous growth rates.</li> <li>Petition of 2,242 signatures entitled Save the Cambridge Green Belt states that plans are based on out of date growth forecasts.</li> <li>Targets based on modelling are unreliable. Replace with a more flexible market-led approach that is attuned to local supply and demand.</li> <li>Over estimates jobs growth, and therefore housing need.</li> <li>Too much development for the area. Pressure on infrastructure. Targets should be based on meeting local needs, rather than focusing on provision of jobs which will bring even more people to the area.</li> <li>Should build more housing in other areas of the UK.</li> <li>There has been no sub-district analysis of where needs are</li> </ul>
	<ul> <li>based.</li> <li>Sites identified in the plan exceed the need identified, and make assumptions about need beyond 2031 that might prove to be totally inappropriate.</li> <li>Should not assume SHMA assessment should be the target. Lower levels of growth also have benefits.</li> <li>Should be clear how much affordable housing will be delivered.</li> <li>Not clear how much housing will be for older people.</li> </ul>
	<ul> <li>Targets should be increased to bring forward new settlements more quickly.</li> <li>Target based on past trends of under-delivery.</li> <li>Considerable immediate need for affordable housing based</li> </ul>

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- on historic under-delivery.
- Has not used latest census data or data on migration.
- Fall in household size has been underestimated.
- Housing need should be minimum of 21,500 to meet in full objectively assessed needs and affordable housing.
  - Existing target is a reduction compared to adopted target.
  - Approach agreed in Memorandum of Cooperation has not sought to tackle affordable housing needs of has ignored the findings of the SHMA.
  - The housing target will need to be increased above this level because there would be a shortfall of 7,300 dwellings arising from the Cambridge City Draft Local Plan 2014.
  - Does not meet NPPF requirements to boost supply of housing.
  - Has not used most up to date census information.
  - Has not taken account of market signals.
  - Occupancy rates not consistent with other authorities.
  - o Age structure not properly addressed.
  - o Ignored historic undersupply.
  - No account taken of student housing.
- Housing needs should be minimum of 24,500:
  - Lack of AH exacerbated by backlog from 2004
     Local Plan and Core Strategy.
  - Affordability ratio has risen significantly since 2001.
     Will not boost housing supply as required by NPPF.
  - Flaws in methodology for demographic projections.
     Larger household size than national average.
  - Affordable housing need is 62% of proposed housing requirement which is highly unlikely to meet AH needs in full.
  - Aging population not adequately addressed.
  - Fails to take account of market signals and strength of demand
  - Appropriate use of SHMA questioned updating chapters one at a time means no up to date and comprehensive conclusion that draws on full extent of SHMA taking all chapters together, including all homes being published before affordable housing needs so that objectively assessed needs not informed by up to date AH need.
  - Not adequately aligned with jobs requirements and likely to result in increased commuting from outside the district and could constrain growth n the local

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- economy.
- City Council not providing sufficient housing to meet its OAN and this will have implications for South Cambs housing strategy
- Need for 19,100 dwellings in plan period for Cambridge, and 25,300 in South Cambridgeshire.
  - Would deliver the step change in development.
  - Support growth potential in local economy.
- Need to consider higher growth targets:
  - Does not make every effort or respond positively to wider opportunities for growth as required by NPPF.
  - Is 25% lower job creation than in 1991-2011.
     Should plan to meet the high growth scenario which would require higher housing growth.
  - City and South Cambs are together planning for 33,000 homes to support 44,000 jobs. Likely to lead to increased commuting, predominantly by car so increasing carbon emissions.
  - Projection methodology flawed based on projections of past trends that sought to restrict housing growth close to Cambridge and house prices have risen so that so called need is not a reflection of the real needs of the Cambridge area but simply a reflection of the restraint policies that put constraints above housing needs, contrary to the NPPF. Points to flaw in CCC's population forecasting by being based on a given planned dwelling stock not housing need. Based on under delivery (shortfall of 4,087 from 2001-2011).
  - Affordable housing need of almost 12,000 leaves 7,000 to meet market needs which is unlikely to be sufficient to sustain economic performance and would be likely to drive prices higher and force more people into housing need
- Housing target should be increased to 20,600 because of:
  - Acute affordability and high migration economic forecast.
  - South Cambs is the logical location for the 2000 shortfall from East Cambs and the target should therefore be 22,600.
  - Delivery of some of the sites proposed in Cambridge is uncertain.
- Insufficient land allocated for employment. An additional 112,700 sq m of employment floor space on 31 ha of land

- is needed. This represents an additional 2,700 jobs.
- Employment land target will also fail to meet the specific need for high-tech manufacturing development.
- The policy states that 'development will meet' the specified target, and paragraph 2.36 states that 'the number of jobs is a forecast and not a target to be met at all costs'. This inconsistency needs to be resolved.
- Para 2.37 seems to indicate the tone for the strategy in which the housing figures of 19,000 are the upper limit of delivery, rather than a target which can be exceeded if there is a need. Should not be revised down.

### **Assessment**

Support from other Councils party to the Memorandum of Cooperation on the apportionment of objectively assessed housing needs identified in the Cambridge Sub Region SHMA is welcomed. The district Council has been working closely with the other authorities in the Cambridge Sub Region Housing Market Area (HMA) to identify housing needs in the HMA as a whole, as well as by district, and to ensure they are met in full through the signing of the Memorandum of Cooperation. Both the Council and Cambridge City Council have committed to meeting in full the housing requirement identified for their areas in the SHMA. The housing target in the Local Plan fully meets the level of objectively assessed needs for South Cambridgeshire identified in the Cambridge Sub Region Strategic Housing Market Assessment (SHMA) (May 2013). The NPPF requires the plan to fully meet the objectively assessed needs for South Cambridgeshire unless it cannot do so. To do so sustainably does however require planning wholly new towns and villages.

The SHMA provides an up to date assessment of housing needs in the wider Cambridge area and meets the requirements of the NPPF. The SHMA is supported by the Population, Housing and Employment Forecasts Technical Report 2013 that identifies a robust level of housing need that includes consideration of a wide range of available forecasts and projections to assess future population and economic growth. This includes from demographic forecasts, economic-led models, and up to date information from the 2011 Census. It therefore takes account of up to date assessments of forecast additional jobs in identifying future population. This is particularly important in the location with strong economic growth where in-migration comprises a significant proportion of total housing needs. The Technical Report identifies an indicative population figure for each district that encapsulates, within a single figure, the overall outlook for the district's population in 2031, on the balance of the available forecasts.

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Using population instead of households as the starting point for an assessment of future housing demand enables comparison of the widest range of projections and forecasts, both demographic and economic-led. This enables comparison and corroboration between different projections and forecasts, without relying on any single source. Relying on household projections may not address sufficiently the need for future housing provision, because these projections are likely to reflect suppressed household formation due to past under-supply of housing. The alternative approach using a Census-based assessment of total expected population provides a basis for determining a housing demand figure that is free from such constraints. The forecasts and projections considered were adjusted to reflect the actual population from Census 2011. There is therefore no backlog of supply to address. The anticipated population increase was then run through the East of England Forecasting model to provide figures for both jobs and homes that are commensurate with each other. A range of other factors were also taken into account, including: market factors, appropriate occupancy ratios (drawing on 2011 Census information and including a future fall in occupancy ratios reflecting the regional trend of an ageing population), and the up to date assessment of affordable housing need.

The resulting objectively assessed housing need was benchmarked against the CLG-based How Many Homes toolkit. For the Cambridge HMA as a whole, a total increase for 2011-31 of 93,000 homes is higher than the How Many Homes figure of 87,700. The picture for South Cambridgeshire follows a similar pattern with 19,000 compared with 18,200 homes. The SHMA also provides evidence of the objectively assessed need for additional jobs during the plan period, taking account of the nature of employment in the wider Cambridge area. The implications for employment land requirements are addressed in Chapter 8.

The SHMA is considered to provide a robust assessment of objectively assessed housing needs as required by the NPPF and the objections put forward that the housing target for the district should be higher, mainly by promoters of sites not included in the Local Plan, are not accepted. The approach taken in the SHMA provides for the collective total of population change in both the HMA and in South Cambridgeshire specifically, and the planned dwellings represent a challenging level of growth that will significantly boost the supply of housing.

Approach in Submission Local Plan

No change

Figure 1 Key Diag	gram for South Cambridgeshire and Figure 2 Key Diagram for
Cambridge and So	outh Cambridgeshire)
Proposed	Total: 362
Submission	Support: 230
Representations	Object: 132
Received	,
Main Issues	Support
	<ul> <li>Cambridge City Council - broadly supportive of the spatial strategy</li> <li>Cambridgeshire County Council - supports the employment related allocations on the edge of Cambridge and the new settlement proposals</li> <li>North Hertfordshire District Council - support as majority of development located away from south of district.</li> <li>Barrington Parish Council - Support for rejection of land at Barrington Quarry.</li> <li>Ickleton Parish Council, Harlton Parish Council, Barton Parish Council, Whittlesford Parish Council, Papworth Parish Council - Support development strategy.</li> <li>Elsworth Parish Council - Support rejection of North Cambourne proposal.</li> <li>Oakington and Westwick Parish Council - Support focus on new settlements.</li> <li>Support for retention of the development sequence.</li> <li>Support decision to rule out further large scale developments in the Green Belt, which would be harmful to Cambridge.</li> <li>New housing on edge of Cambridge is essential for public</li> </ul>
	<ul> <li>New housing on edge of Cambridge is essential for public transport and cycling.</li> <li>Support housing in a few new settlements rather than many rural locations. Smaller villages do not have infrastructure to serve growth. New settlements offer opportunity to deliver sustainable infrastructure.</li> <li>Bourn airfield is an underused brownfield site.</li> <li>Waterbeach is well placed for further development.</li> <li>Support rejection of site north of A428 Cambourne (156 representations)</li> <li>Support rejection of Hanley Grange.</li> </ul> Object <ul> <li>Barrington Parish Council – Plan does not support sustainability. Should cap scale of development at villages, do more to protect services and improve transport to villages.</li> <li>Bourn Parish Council - Fundamental problem with</li> </ul>
	development strategy, it fails to align employment areas

Policy S/6: The Development Strategy to 2031 (and Paragraphs 2.42 to 2.46 and

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- with housing areas. Has not considered potential of sustainable villages, so they can improve their local services. SHLAA took a passive role.
- Cambourne Parish Council, Caldecote Parish Council –
   Bourn Airfield and Cambourne West are unviable.
- **Great Abington Parish Council** Unhappy at the focus on new communities, leaves Abingtons with no growth.
- Great Shelford Parish Council Putting edge of Cambridge at the top of development sequence could add to pressure for Green Belt development.
- Horningsea Parish Council Indirect impact from Waterbeach new town, including from traffic.
- Madingley Parish Council A1303 already over capacity.
- Oakington and Westwick Parish Council Policy should state brownfield land first.
- Teversham Parish Council opposes the decision to carry forward the Cambridge East Area Action Plan and safeguard airport.
- Environment Agency general support but need to fully resolve issues regarding wastewater treatment at Cambourne west.
- Wildlife Trust further formal assessment of the Waterbeach New Town site is required to prove that this scale of development is achievable while still being able to retain significant areas for biodiversity. The Key Diagram has omitted to show some important ecological networks.
- **Middle Level Commissioners** Concerned at extra flows to Uttons Drove waste water treatment works.
- Question the need for the level of development.
- Will lead to urban sprawl with Cambridge merging with surrounding villages.
- Large scale of development already planned at Northstowe.
- Policy should include requirement to prioritise previously developed land.
- Sites identified until 2050, beyond the remit of the plan.
- Remove Bourn Airfield / west Cambourne:
  - Insufficient road capacity on A428 corridor.
     Madingley Road upgrade inadequate.
  - Consider new guided busway.
  - Traffic in Cambourne and surrounding villages.
  - o Impact on villages in A1198 corridor.
  - The area is overdeveloped / spread development elsewhere
  - No funding available for infrastructure.
  - Expensive public transport.

- Small housing developments in the countryside instead
- Develop on edge of Cambridge instead.
- People moved to Cambourne to be in a village.
- Urban sprawl and loss of village character.
- Lack of local employment. Employment land in employment allocated for housing.
- A strip of new Green Belt is required to separate Bourn Airfield from Cambourne.
- Bourn Airfield will end up as a satellite to Cambourne, reliant on its services.
- Failed to consider development near southern employment areas.
- SCDC has not sought to proactively identify and help bring forward any potentially more suitable and sustainable sites.
- Remove Waterbeach:
  - o Transport impacts, particularly on A10.
  - Flood Risk
  - focus development on the barracks site and complete earlier in the plan period.
- Bourn Airfield should not be held back unfairly and 5 years later than Cambourne West.
- Waterbeach new town should be moved forward in the trajectory.
- Cumulative delivery impact as all three new settlements are north of Cambridge.
- Policy should differentiate between new town and new villages, as new villages only as sustainable as Rural Centres
- Over reliance on a few large sites will lead to under delivery, particularly due to level of infrastructure required.
- Insufficient regard has been given to the potential for further development on the edge of Cambridge due to greater weight being given to the protection of the Green Belt than wider sustainability considerations, in particular transport related.
- Should continue Structure Plan development sequence.
   Strategy reverts back to dispersal.
- Maintaining Cambridge as a compact city is unjustified as Cambridge has an important role in the UK economy.
- Petition of 2,242 signatures calling for withdrawal of sites in the Green Belt.
- Edge of Cambridge Green Belt should be last resort rather than top of sequence.
- Exceptional circumstances for Green Belt review has not

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been demonstrated.

- Green Belt sites should be developed last, if they are needed at all.
- Should have considered role of market towns around for meeting housing needs.
- Should be more development at villages to meet local housing needs and utilise and support existing infrastructure.
- Villages should be allowed to choose to have additional growth.
- Planning no development will harm group and infill villages, making them homes for only richer people.
- Scale of restrictions on village development not flexible to allow development opportunities on Previously Developed Land to be taken.
- Should support growth of villages along the Guided Busway.
- Policy should state that building in villages will only happen if demand for new homes cannot be met through development on edge of Cambridge and new settlement sites.

# Non- Edge of Cambridge proposals for new / alternative strategic sites:

- NORTHSTOWE Land north and east of Northstowe. (SHLAA Site 274)
- LAND NORTH OF CAMBOURNE, Land north of A428, Cambourne (SHLAA Sites 194 & 265)
- LAND AT CAMBOURNE WEST (extend closer to Caxton Gibbet)

# (Proposals for Strategic development on edge of Cambridge listed under S/4).

## **Assessment**

There is significant support for the development strategy policy, including from Cambridge City and Cambridgeshire County Councils and a number of parish councils.

Objections are made by a number of parish councils for a range of reasons, including those that do not support development proposals in their areas to those that are concerned that they may get pressures for more development than the plan shows and one parish council wanting more development locally to respond to its own needs. Issues raised on water impacts of the plan and ecology at Waterbeach new town proposal are dealt with elsewhere to separate representations.

Representations on specific locations fall into three groups: those that wish to see one or more of the new strategic proposals at Waterbeach new town, Bourn Airfield new village or Cambourne West village extension deleted from the plan; those that propose large scale development on the edge of Cambridge through Green Belt release; and those objecting to any release of land from the Green Belt on the edge of Cambridge or at larger villages within the Green Belt. A large number of representations are registered against those specific policies, in particular Bourn Airfield (1,817), and there is a petition against any Green Belt releases with a very large number of signatures (2,242). The specific issues raised on the strategic sites in the plan are addressed in Chapter 3 and the phasing of those sites at Policy S/12. The Green Belt issues are addressed at Policy S/4.

There has been close joint working with the City Council, including on the development strategy and the appropriate approach to the focus of development. This included coordination of issues raised in the Councils' first Issues and Options consultations and a joint Part 1 document in the Issues and Options 2 consultation. These were supported by joint evidence documents. A review of the development strategy supports both Local Plans. It tests the sequence for development and explains why the edge of Cambridge remains the most sustainable location for development in terms of access to services and facilities. The Issues and Options 2 Joint Part 1 consultation specifically asked what the appropriate balance is between the locational merits of the edge of Cambridge and the importance of protecting the Green Belt setting of Cambridge as an important historic city.

The transport implications of the different strategy options were tested through transport modelling during the evolution of the development strategy in the Cambridge Sub Regional Transport Modelling Report for Cambridge and South Cambridgeshire Local Plans (2013). This informed the preparation of the development strategy. The sustainability appraisal undertaken jointly by the two Councils informed the conclusion that the accessibility benefits of edge of Cambridge locations do not to override the Green Belt importance of the majority of the edge of Cambridge sites, and that new settlements will enable significant transport improvements to be focused on two corridors to deliver high quality public transport and create sustainable developments. 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 joint Inner Green Belt Study Review 2012 identified a small number of areas that could be released from the Green Belt

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without fundamental harm to its purposes and these areas are proposed to be allocated for development (see Policy S/4). 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. The proposed development strategy carries forward the emphasis on Cambridge-focused development contained in the Structure Plan 2003, with similar proportion of development in and on the edge of Cambridge, but it has a greater proportion of new development in new settlements and less in villages. This represents a sustainable development strategy for the wider Cambridge area that meets objectively assessed housing needs in a way that supports the successful economy and provides pattern of development that will give genuine opportunities for residents of new developments to live in a sustainable way. Many will benefit from new settlements that provide a wide range of services and facilities and, with significant new public transport measures on the two corridors involved akin to the successful Guided Busway, the opportunity to move around the area by sustainable modes of transport. The strategy has a focus on major developments that create the opportunity for high quality local service provision, but in order to provide a robust and flexible strategy with a variety in the type and size of housing sites, it also provides a number of village housing and employment sites that are located in the larger and better served villages and can help keep maintain a vibrant rural area. The plan also defines village categories based on the level of services and facilities available to local residents and polices to enable some development to come forward commensurate with their local character and to meet local needs. For main issues and assessment of strategic objection sites see Annex A. Approach in No change Submission Local Plan

Policy S/7: Development Frameworks (and Paragraphs 2.48 to 2.49)	
Proposed	Total: 131
Submission	Support: 55 (including 4 from Parish Council (PC))

Representations	Object: 76 (including 4 from PC)
Received	
Main Issues	<ul> <li>Support</li> <li>The Wildlife Trust – Pleased recognition of need to protect and enhance features of local ecological importance.</li> <li>Bassingbourn PC – Support boundaries and rejection of 7 SHLAA sites.</li> <li>Bourn PC &amp; – Fowlmere PC – Support.</li> <li>Papworth Everard PC – Strongly support retention to control and limit expansion of Minor Rural Centres and smaller villages.</li> <li>Barrington PC – Development on land at Barrington Quarry (Cemex proposal) would not be compatible with local character.</li> <li>Comberton PC – Support change (PC3) - white land outside Green Belt - logical regardless whether Bennell Farm is allocated.</li> <li>Fulbourn PC – Support Fulbourn development framework. (16)</li> <li>Little Gransden PC – Strongly support rejection of expansion. Unlikely to provide social housing. Infrastructure unsuitable.</li> <li>Vital to keep development cohesive and sustainable - protects communities (avoids isolation) &amp; village / countryside character.</li> <li>Controls development whilst not restricting local growth. Small villages tend not to have infrastructure for large developments.</li> <li>Brownfield sites should not be considered just because they are brownfield – take account of effect on villages.</li> <li>Criterion 1a - Developments must be small enough to integrate into village community and effective provision of local services.</li> <li>Criterion 1c – Strongly agree – doctors, schools, roads.</li> <li>Criterion 2 – Vital to prevent 'planning creep'. If no need to locate in countryside, should be in urban location for access and infrastructure as much as preservation. 'Other uses' vague.</li> </ul>
	<ul> <li>Object</li> <li>Anglian Water – Include reference to drainage infrastructure.</li> <li>Cambridgeshire County Council – Support, but could impact being able to respond to demand for school places. Suggest change wording to permit key community infrastructure outside.</li> <li>Bourn PC – Strongly favour maintaining to ensure settlements don't coalesce / lose character. Define "previously developed".</li> <li>Great Abington PC – Approach leaves smaller villages with few development opportunities. Local need cannot be met on exception sites - allow minor amendments to meet needs.</li> <li>Ickleton PC – Rare occasions where flexibility would be welcome if proposal clearly backed by the parish council.</li> <li>Whaddon PC – Want to review boundaries to address future housing requirements without producing a Neighbourhood Plan.</li> <li>Approach taken is unduly restrictive. Not consistent with principle of support for sustainable development in NPPF.</li> <li>Some parishes would like frameworks changed where it would</li> </ul>

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- meet identified needs, of appropriate size and has local support.
- Should require brownfield first in accordance with NPPF.
- Criterion 2 At odds with NPPF & Policy H/10. Appropriate to develop outside for local housing need / more appropriate use for site. Can deliver / sustain new / improved services.

# Objections proposing amendments to framework boundaries at:

- Barrington Land west of Orwell Road
- Bassingbourn Land north of Elbourn Way
- Caldecote Land to the rear of 18-28 Highfields Road
- Caldecote Mobile Home Park
- Comberton Birdlines Manor Farm, South Street
- Cottenham Land at the Junction, Long Drove and Beach Rd
- Croxton Properties fronting Abbotsley Road and A428
- **Dry Drayton** Longwood
- Duxford Rear of 8 Greenacres
- Eltisley Caxton End
- Fowlmere Land west of High Street
- Fowlmere Land at Triangle Farm
- Fulbourn Balsham Road and Home End
- Fulbourn 36 Apthorpe Street
- Gamlingay Land at Potton Road
- Girton Southern side of Huntingdon Road
- **Graveley** Toseland Road
- Great Abington Land east of Great Abington & Land at Pampisford Road
- Great Shelford Land south of Great Shelford Caravan and Camping Club, Cambridge Road
- Great Shelford Land off Mingle Lane, Great Shelford
- Great Shelford Scotsdales Garden Centre
- Guilden Morden Land south of 33 Dubbs Knoll Road
- Hardwick Land at Rectory Farm
- Harston Land to the rear of 98 102 High Street
- Harston North of Haslingfield Road
- Harston Button End
- Harston various amendments
- Histon and Impington Land west of 113 Cottenham Road, Histon
- Histon and Impington Land north of Impington Lane, Impington
- Horningsea Garden Centre, High Street
- Ickleton Land to rear of Old Vicarage, Butcher's Hill
- Linton Land adjacent to Paynes Meadow
- Litlington Land at Longview, 1 Manor Farm Barns, Crockhall Lane
- Little Gransden 84 Main Road
- Little Gransden Land to rear of 4 Primrose Hill

- Little Gransden Land at The Drift
- Little Gransden South of Main Road (PC5)
- Little Gransden Bounding 6 Primrose Hill, (PC4)
- Longstanton Melrose House
- Meldreth Bury Farm, North End
- **Meldreth** Land r/o 79 High Street
- Orwell Volac International
- Pampisford Land East of High Street
- Pampisford London Road
- Papworth Everard Land at The Ridgeway
- Sawston Land to the rear of 41 Mill Lane
- **Toft** Buildings adjacent to Meridian Court
- Waterbeach Bannold Road
- Waterbeach Land off Bannold Road / Bannold Drove
- Waterbeach Land off Gibson Close
- Whittlesford Ryecroft Paddock

### Assessment

The policy has been carried forward from the Adopted Development Control Policies DPD, where it was found sound through the examination. The policy requires the availability of infrastructure to serve development. Specific reference to drainage infrastructure is not required, as it is addressed by other policies in the plan.

It is not appropriate for the plan to allow for key community infrastructure to be provided outside frameworks, as they should be in accessible locations. Where not possible this could be considered as an exception through the planning application process dealing with each case on it merits. The policy provides flexibility for some uses to be located outside frameworks, and extension of school playing fields into the countryside could be considered consistent with policy.

Previously developed land is defined in the Glossary.

The Council consulted on options for frameworks: to retain as they are, retain but allow some development on the edge of villages, or delete them. There was clear support for retaining village frameworks along existing lines and on balance it was considered that changing the approach to frameworks would undermine the sustainable development strategy, by loosening controls on the scale of development in rural areas. It could also undermine delivery of affordable housing exception sites; important for meeting affordable housing needs in rural areas. Flexibility has been introduced for specific uses by other policies in the plan.

The Council assessed proposals put forward during the Issues and Options consultations to amend framework boundaries and consulted on options, including Parish Council Proposals, in Issues and Options 2. The Council included those with demonstrable local

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support within the plan. Proposals by Great and Little Abington Parish Councils for housing development and framework changes are addressed at Policy H/1 and changes proposed to include the Parish-led proposals. Proposals by Whaddon Parish Council for housing development and framework changes are also considered at Policy H/1. Further Parish Council changes can be included within Neighbourhood Development Plans if desired by the local community or the next review of the Local Plan.

The principle of focusing development on brownfield land where available and in suitable locations has influenced the strategy and policies, including allocations for development. Any further development, permitted within frameworks will be windfalls as opportunities arise; by its nature it is not possible to prioritise such development.

Policy H/10: Rural Exception Sites for Affordable Housing is consistent with the NPPF and Policy S/7: Development Frameworks as it allows affordable housing outside frameworks as an exception to the normal rule (Policy S/7) in order to meet an identified local need. Where viability is an issue, a minimum amount of market housing will be permitted. The scale of development is limited to the identified needs and settlement characteristics.

50 amendments to framework boundaries were proposed by objectors; these are considered in Table 3 of the Development Frameworks evidence paper update. One is already within the framework (Ref. 78) and another seeks to amend the boundary of a housing allocation in the Local Plan (Ref. 104). One site has planning permission to demolish two barns and replace them with offices with a "traditional agricultural character" (Ref. 122). One has planning permission (Ref. 81) and another outline planning permission (Ref. 111) for residential development. Once implemented, it can be considered at the next plan review whether they should be included in the framework. 19 are new sites and the remainder have been considered previously, as a proposed amendment to the framework and/or a proposed SHLAA site. No changes are proposed.

# Approach in Submission Local Plan

No change

Policy S/8: Rural Centres (and Paragraphs 2.51 to 2.54)	
Proposed	Total: 23
Submission	
Representations	Cambourne: Support: 2 Object: 0

Deceived	Cattonhom, Cumport, 2 Ohisat, 0
Received	Cottenham: Support: 3 Object: 0
	Great Shelford and Stapleford: Support: 1 Object: 0
	Histon and Impington: Support: 2 Object: 2
	Sawston: Support: 1 Object: 0
	Other Issues: Support: 4 Object: 8
Main Issues	Support
	Bourn Parish Council / Gamlingay Parish Council –
	Supports inclusion of these villages.
	Elsworth Parish Council Support existing approach to
	hierarchy development limits.
	Sawston - provides many key facilities making it an ideal
	village for building essential and long overdue housing.
	Cambourne – Support recognition Cambourne is a
	sustainable settlement.
	Cottenham – Local facilities employment, transport, large
	vibrant village with capacity for further expansion.
	Great Shelford – appropriately recognised as rural centre.
	Histon and Impington – Meets criteria and is correctly
	identified.
	identined.
	Object
	Object
	Anglian Water – Reference to infrastructure should include  desire and infrastructure.
	drainage infrastructure.
	Histon and Impington Parish Council - Policy should
	make clear that retail and commercial businesses serve a
	wider community than settlement itself. Should encourage
	small business premises. Developments should not be
	encouraged which will relocate employers away from rural
	centres.
	<ul> <li>Cottenham, Great Shelford, Histon and Impington – too few</li> </ul>
	sites in Rural Centres to meet housing needs. Should
	allocate additional sites. H/1 favours sites at Minor Rural
	Centres.
	<ul> <li>Histon and Impington – Infrastructure cannot sustain</li> </ul>
	additional development.
	<ul> <li>Add to policy that delivery of infrastructure should be</li> </ul>
	demonstrated in detail with the planning application.
Assessment	There is general support for the villages being classified as Rural
	Centres.
	The Local Plan provides a focus on strategic scale development
	but with a proportion of sites at larger, better served villages. Of
	the 900 homes allocated at village sites 66% are at Rural Centres
	and 34% at Minor Rural Centres (to be done). A range of site
	options at both Rural Centres and Minor Rural Centres were
	considered and consulted on during the Issues and Options
	process (and documented in the Sustainability Appraisal Audit
	Process (and documented in the Sustainability Appraisal Addit

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

	Trail). The Local Plan includes the most appropriate and sustainable package of site allocations. The policy will also enable
	the recycling of land, through windfall development within these villages.
	The policy specifically requires the availability of infrastructure to serve development. A specific reference to drainage infrastructure
	is not required, as it is addressed by other policies in the plan.
	This section of the plan could do more to highlight the role of Rural
	Centres serving a rural hinterland with local services and facilities and employment. This is already acknowledged in paragraph 8.70.
Approach in	Minor change
Submission	
Local Plan	Add to end of paragraph 2.52:
	'They perform a function in serving not only the population
	within the rural centre but also a rural hinterland of smaller
	villages.'

Policy S/9: Minor R	Rural Centres (and Paragraphs 2.55 to 2.57)
Proposed Submission Representations Received	Total: 298  Bar Hill: Support: 1 Object: 0 Bassingbourn: Support: 0 Object: 2 Comberton: Support: 1 Object: 21 Fulbourn: Support: 31 Object: 3 Gamlingay: Support: 2 Object: 1 Girton: Support: 0 Object: 8 (plus petition of 22 signatures) Melbourn: Support: 201 Object: 3 Papworth Everard: Support: 1 Object: 0 Waterbeach: Support: 0 Object: 1
Main Issues	<ul> <li>Willingham: Support: 1 Object: 0</li> <li>Other issues: Support 11 Object 10</li> <li>Support         <ul> <li>Bourn Parish Council – agree with selection of Minor Rural Centres</li> <li>Elsworth Parish Council - Support existing approach to hierarchy development limits.</li> <li>Fulbourn Parish Council – Support status as Minor Rural Centre.</li> <li>Gamlingay Parish Council – Support status as Minor</li> </ul> </li> </ul>
	<ul> <li>Rural Centre.</li> <li>Papworth Everard Parish Council – Support status as Minor Rural Centre.</li> <li>Bar Hill – support for identification as a Rural Centre.</li> <li>Comberton – ideal for development.</li> </ul>

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

- Fulbourn Support for classification as Minor Rural Centre.
   Reflects availability of facilities.
- Melbourn Support for Minor Rural Centre Status.
- Willingham appropriately placed recognising services and facilities.

### **Object**

- Bassingbourn cum Kneesworth Parish Council The
  assessment is heavily weighted towards villages having a
  Village College, in part because of the facilities provided for
  the wider community. Unlike other village colleges,
  Bassingbourn Village College provides only very limited
  facilities for the wider community. Surrounding villages look
  to Royston not Bassingbourn as their centre. Other factors
  do not provide an alternative justification.
- Comberton Parish Council Comberton lacks comparable infrastructure (current/potential) to support a Minor Rural Centre classification but it does as a 'better served Group Village'. Reclassification is superfluous since no practical sites to support further development within village framework. Majority of residents support no significant changes.
- **Girton Parish Council** Object to Minor Rural Centre status. Full-time Post Office now part-time. School at capacity. Infrastructure not available to support growth.
- Comberton Does not compare favourably with Minor Rural Centres. Lacks infrastructure. Village College is in Toft. No mains gas. No A road. No Sunday buses, Drainage issues. One small shop. More people travelling to find work. Development would harm rural character.
   Development larger than 8 dwellings unsustainable. No practical sites. Better described as a Better Served Group Village. Should focus development on large brownfield sites.
- Fulbourn- object to downgrading of village. Has a good range of services and facilities. It is one of the largest and most sustainable villages in the South Cambridgeshire District. Good access to employment and education. There is no strategy to make the villages more sustainable. Sites rejected without consideration of affordable housing needs of village.
- Gamlingay Fulfils criteria to be a Rural Centre.
- Girton Object to minor rural centre status does not perform a wider role as a service centre. GP not full time. Cashpoint is at garage. Not comparable with other villages. No scope for larger windfall development.
- Melbourn objection to Minor Rural Centre Status.
- Waterbeach should be reclassified as Rural Centre.

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

sustainable settlement which is capable of accommodating new residential development.

### Other Issues:

- Fulbourn Object to further development in Fulbourn.
- Bassingbourn, Fulbourn, Gamlingay, Linton, Papworth Everard, Waterbeach – Too few sites allocated, not planning growth beyond existing commitments, will not meet affordable housing needs of villages.
- Should allow development adjoining frameworks, as they are tightly drawn development is currently unlikely.
- Thresholds are arbitrary. Should be based on ability to accommodate the individual development on its merits.
- Should not be specific limits on scale. Should support other issues e.g. accommodation for the elderly.
- Figures should be referred to as an indicative guide rather than a limit.
- Additional criteria should be added that larger developments are proposed Parish Councils should have to agree.

#### Assessment

As detailed in the Village Classification report supporting the Local Plan, five settlements (Bassingbourn, Comberton, Girton, Milton and Swavesey) previously in the Group Village category stood out above existing Group villages, particularly due to the presence of employment, public transport, secondary education and 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.

Bassingbourn village college does provide services to the community, including a sports centre.

Comberton benefits from the village college and a range of services and facilities bringing it above the standard of Group villages.

Girton and Milton compare favourably in terms of services and facilities with three of the Minor Rural Centres. They have therefore been included in this category.

The assessment carried out as part of the review of the hierarchy demonstrates that Fulbourn does not perform on a comparable level with the Rural Centres, and is more comparable with a number of Minor Rural Centres.

	Gamlingay, Melbourn and Waterbeach do not warrant Rural Centre status according to the assessment.
Approach in	No change
Submission	
Local Plan	

D. II. 0/40 0	\(\text{CH}  \( \text{LB} \) \(\text{LQ 50} \)
Policy S/10: Group	Villages (and Paragraph 2.58)
Proposed	Total: 73
Submission	
Representations	Barrington: Support: 13 Object: 0
Received	Duxford: Support: 1 Object: 1
	Fen Ditton: Support: 0 Object: 1
	Fowlmere: Support: 1 Object: 0
	Foxton: Support: 1 Object: 0
	Great Abington: Support: 0 Object: 1
	Hardwick: Support: 0 Object: 2
	Highfields Caldecote: Support: 0 Object: 1
	Longstanton: Support: 0 Object: 1
	Meldreth: Support: 1 Object: 0
	Orwell: Support: 1 Object: 0
	Over: Support: 0 Object: 2
	Whittlesford: Support: 0 Object: 1
	William Capport. o Object. 1
	Other Issues: Support: 34 Object: 11
Main Issues	Support
maiii issues	Bourn Parish Council – agree with classification of Group
	villages.
	Elsworth Parish Council – Support maintaining numerical
	limits.
	Fowlmere Parish Council – Support policy.
	Small scale development will benefit villages, appropriate
	to this scale of community.
	Will protect character of small villages.
	Support recognition of slightly larger developments on
	brownfield sites.
	browniield sites.
	Object
	Great Abington Parish Council – Does not allow growth
	that the community wants. We have excellent services.
	Exception sites should not be the only way to facilitate
	development in Group villages like the Abingtons. (the
	Parish Council have proposed specific development sites,
	which are addressed in the Housing chapter)
	Duxford – Scores the same as a number of Minor Rural
	Centres. Access to employment and rail services. Little
	prospect of tackling affordable housing need if remains as
	Group village.
	Group village.

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- Fen Ditton Should be a Rural Centre. Close to the City.
   There is a lack of development at villages.
- Hardwick Has existing facilities, and housing growth would provide additional facilities.
- Longstanton fails to take into account recent development, the guided bus, and Northstowe.
- Over Excellent range of services, short distance from the guided bus.
- Whittlesford Restrictions mean affordable hosing need not being met. Good transport infrastructure. Village should be allowed to develop further.

## Policy criteria:

- Barrington Parish Council Support scale restriction, but object to lack of a cap on number of developments. Plan should specifically prevent housing development on Barrington Cement Works.
- Should be more flexibility in policies for villages.
- Barrington, Caldecote Potential sites rejected. No assessment of capacity of villages to accommodate development. Will not meet affordable housing needs of village.
- Fails to ensure village needs will be met. Will cause village decline. Does not reflect presumption in favour of sustainable development.
- Could prevent efficient use of brownfield land.
- Placing an arbitrary limit on the permitted size of development is unnecessary and restrictive. Sites should be considered on their merits.
- Should allow development adjoining development frameworks where justified and without adverse impacts.
- Scale should only be an indicative guide.
- Direct conflict with NPPF, which acknowledges settlements in rural area often rely on each other for services and therefore do not individually contain a full range.
- Should recognise sustainable group villages like Fowlmere, and remove or increase development limits.

### Assessment

A number of representations ask for villages to be upgraded in the settlement hierarchy. However, it is considered that the villages have been correctly classified as Group villages. In particular:

• Great and Little Abington - even when combined have a population only around 1300. The villages are separated by around 500m. There is a small village store and few other services and facilities. Both villages are correctly classified as Group villages. The Parish Councils' proposals for housing sites have been considered separately, in the housing chapter (Chapter 7), where changes are proposed to include these Parish-led

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

- proposals in the plan given evidence of local support as part of the Council's approach to localism in the plan.
- Duxford The village has an hourly bus service, and very limited services and facilities. It would score well on the employment category due to the industrial area to the south of the village. However, overall the village does not merit a higher status.
- Fen Ditton a small village with limited services and facilities. Whilst it benefits from proximity to Cambridge the village itself is not comparable with the Minor Rural Centres and does not merit a higher status.
- Hardwick benefits from the bus service on the A428 corridor, but its range of other services and facilities is limited. It is not in the catchment area of Cambourne Village College and there are no scheduled bus services to Comberton Village College. There is no evidence submitted to suggest the delivery of 150 dwellings would be sufficient to deliver a new local centre.
- Longstanton and Over Only Northstowe is located on the Guided Busway. Like most villages along its route, these villages are some distance from the Guided Buswayand are not generally in easy walking distance of the village Busway stop, although they would be within cycling distance. They also do not perform well in terms of the overall level of services and facilities. Using the consistent assessment approach, it is therefore not considered that the villages warrant a higher status despite being near to the Guided Busway.
- Whittlesford / Whittlesford Bridge Whittlesford Bridge is over 1km from the centre of Whittlesford, along a rural road. Apart from the railway station it has few services, and does not warrant a higher status.

The policy addresses the size of individual development schemes, rather than placing a cap on the total number of new dwellings in a particular village. National Planning Practice Guidance advises that plans should not place a blanket ban on development in villages. The policy enables the recycling of land on small sites, supporting the continued evolution of villages, but avoids large scale estate schemes which would create unsustainable scales of development. Alongside this policy the exceptions sites affordable housing policy (Policy H/10) will also support meeting local housing needs. The Strategy for the Rural Areas aims to provide an appropriate balance for South Cambridgeshire, and is compatible with the National Planning Policy Framework.

There is sufficient flexibility in the policy to consider individual sites, but the removal of thresholds for development in small

Key Issues and Assessment

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	villages would not contribute to the sustainable development of the district.  The principle of village frameworks is addressed by policy S/7. Introducing greater flexibility would undermine the sustainable development strategy being established through the plan, by loosening controls on the scale of development in rural areas. It could also undermine the delivery of affordable housing exception sites, which are important mechanism for meeting affordable housing needs in rural areas.
Approach in Submission Local Plan	No change

Policy S/11: Infill V	illages (and Paragraph 2.59)
Proposed	Total: 24
Submission	
Representations	Babraham: Support: 1 Object: 0
Received	Graveley: Support: 0 Object: 3
	Heathfield: Support: 1 Object: 0
	Ickleton: Support: 2 Object: 0
	Kneesworth: Support: 1 Object: 2
	Pampisford: Support: 0 Object: 1
	Papworth St.Agnes: Support: 1 Object: 0
	Wimpole: Support: 1 Object: 0
	Other Issues: Support: 9 Object: 2
Main Issues	Support
	Bassingbourn cum Kneesworth Parish Council – agree
	with infill status for Kneesworth.
	Bourn Parish Council – agree with characterisation of
	Infill villages.
	Elsworth Parish Council – Support maintaining numerical
	limits.
	Ickleton Parish Council – agree with infill status for
	lckleton.
	Madingley Parish Council – Notes no proposed changes for the Parish.
	Papworth Saint Agnes Parish Meeting – agree with
	status of Papworth St.Agnes.
	Support for the Infill village policy.
	Object
	Graveley Parish Council – Small scale development
	proposed, which warrants an exception to policy (the
	Parish Council have proposed specific development sites,
	which are addressed in the Housing chapter).
	Kneesworth – should be joined with Bassingbourn. Uses all

Bassingbourn's facilities. More sustainable than other infill villages. Would allow further development along the Causeway. Placing an arbitrary limit on the permitted size of development may be unnecessarily restrictive. Development framework boundaries around villages should be amended and the size of schemes reviewed so that housing and affordable housing needs in the Infill Villages can be met. Flexibility is lost in paragraph 2.59 which seems to suggest that development exceeding 8 dwellings will not be permitted. This is too prescriptive, inconsistent with Policy S/11 and unjustified. Assessment The policy enables the recycling of land on small sites, supporting the continued evolution of villages, but avoids larger scale schemes which would create unsustainable scales of development in these very small villages with very limited services or facilities. Alongside this policy the exceptions sites policy for affordable housing (Policy H/10) will also support meeting local housing needs. The Strategy for the Rural Areas aims to provide an appropriate balance for South Cambridgeshire, and is compatible with the National Planning Policy Framework. There is sufficient flexibility in the policy to consider individual sites, but the removal of thresholds for development in small villages would not contribute to the sustainable development of the district, would not be well served by public transport, and would disproportionately add traffic onto Cambridge and South Cambridgeshire's already congested roads. One representation seeks for Bassingbourn and Kneesworth villages to be considered as one. Due to the distance and separation between the two this would not be appropriate, and Kneesworth should remain an Infill village. Site proposals by Graveley Parish Council have been considered separately, in the housing chapter as part of the Council's approach to localism and working with Parish Councils. Paragraph 2.59 appropriately reflects the policy, and does not need to be amended.

A minor technical change is also proposed to include Streetly End in the policy. It is a very small village shown on the adopted and proposed Policies Maps as having a development framework but missing from the list of villages in the policy.

Approach in Submission Local Plan

Minor change

Include **Streetly End** in the list of Infill Villages.

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

Proposed	Total: 64						
Submission	Support: 4						
Representations	Object: 60						
Received							
Main Issues	Support						
	<ul> <li>Natural England - Monitoring indicators to assess the</li> </ul>						
	effectiveness of Plan policies are welcomed.						
	<ul> <li>Support the need to delay Waterbeach to avoid adverse impact on delivery of Northstowe.</li> </ul>						
	Object						
	<ul> <li>Homes and Communities Agency - supports the phasing of new settlements (e.g. Bourn Airfield and Waterbeach Barracks) as set out in Policy S/12. Is important to ensure the timely delivery of new settlements and the continuous supply of housing. Is also essential to the successful delivery and establishment of each new settlement. Policy should be amended to encourage and support the early delivery of Northstowe as the first priority as each new settlement must be afforded the time to properly establish itself as a place where people choose to live. Delivery of new settlements in parallel with each other would have the potential to overwhelm the housing market and could compromise the delivery of future phases of individual new settlements.</li> <li>Move forward trajectory of Waterbeach 1 year would mean</li> </ul>						
	no Green Belt development required.  • Move Waterbeach forward therefore no need for Bourn Airfield new village. Plan identifies far more housing than the identified need.						
	<ul> <li>Increase build rate of new settlements quicker to help deliver critical mass.</li> </ul>						
	Bourn Airfield should not be held back unfairly and 5 years later than Cambourne West.						
	<ul> <li>Waterbeach should be allowed to come forward 5 years earlier.</li> </ul>						
	Policy should prioritise delivery of Northstowe.						
	Assumptions regarding delivery of new settlements are						
	overoptimistic due to infrastructure requirements.						
	<ul> <li>Northstowe trajectory is over optimistic, and anticipated delivery rate is too high.</li> </ul>						
	<ul> <li>Over reliance on a few large sites has contributed to</li> </ul>						
	shortfall. Proposed development strategy repeats this.						
	<ul> <li>No positive planning to rely on windfalls. Uncertain that</li> </ul>						

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment supply will continue. Only based on most recent five year period. SCDC now seeks to control development on garden land.

- Contribution of windfalls could be higher than anticipated.
- If windfalls were counted as the City Council has done, there would be an over supply, and no need to allocate greenbelt sites like Impington Lane.
- South Cambs has a persistent record of under delivery.
   Economic downturn is no justification. Land supply buffer should be 20% rather than 5%.
- Need to allocate more sites of a variety of scales in a variety of locations.
- Action to bring forward previously developed land should be part of strategy, not a response to shortfalls.
- Trajectory shows not enough housing until 2021. Boost needed now.

#### Assessment

A range of views has been received both that the trajectory is over optimistic and more sites need to be allocated to provide sufficient housing, including in the short term, and that a number of sites could come forward quicker than is anticipated. The promoters of Waterbeach new town and Bourn Airfield new village assert that their developments could come forward earlier than assumed in the housing trajectory and that they shouldn't be held back by the plan. The HCA supports the phased approach to delivery of the new settlements as part of a strategy that supports delivery at Northstowe becoming established before competing new settlements start to come forward.

The Council has taken a robust approach to the housing trajectory, drawing on experience over a number of years of the delivery of housing in the district. The plan aims to provide a flexible and balanced approach that allocates the full housing target and make sensible assumptions on delivery. Experience of delivering new settlements at Cambourne and Northstowe demonstrate the longer lead-in times for these major developments and the trajectory is cautious on the assumptions for Northstowe, particularly as it will continue to be developed beyond the plan period and any over optimistic assumptions would leave the plan with an undersupply to 2031 if delivery falls below those levels. On the other hand, Northstowe is a key part of the development strategy and there is an impetus now gaining momentum for delivery to start on site and for delivery rates to build quickly and be sustained. The trajectory has been updated in the Annual Monitoring report based on a survey of promoters of individual developments to ensure the most robust assessments possible. 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

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maximum delivery of 400 homes per annum. There are no controls in the plan on the rate of delivery of Northstowe so if it can deliver more there are no planning policy barriers to that, but it is not assumed for the reason given above.

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. This could risk slowing the rate of delivery of these new developments by prolonging the time during which they are the least attractive developments on the market because they are not yet of a scale to provide the full range of services and facilities that are available in developments elsewhere. 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. Again, as developments that will continue beyond 2031, it is important to be robust in the assumptions made on delivery. Bourn Airfield is also programmed to start delivering a year later than the Council considers it otherwise could, as part of a strategy to manage the delivery of housing and provide flexibility in the plan. The plan allows for both Waterbeach and Bourn Airfield to come forward earlier if needed to ensure a 5-year housing land supply. The HCA support for the phasing of the two additional new settlements is consistent with the Council's view.

As addressed at Policy S/6: Strategy, the plan includes a range of types, sizes and locations of sites to provide a robust and flexible strategy but appropriately remains focused on larger more sustainable forms of development. This includes an element of village sites far beyond that in the adopted plan focused on the larger better served villages.

The trajectory includes a robust allowance for windfalls that is supported by evidence and is consistent with the NPPF. Garden land cannot be included in the windfall allowance, but any planning permissions granted for development of garden land can subsequently be counted as part of housing supply. The Council has evidence of a consistent supply of windfalls over a long period of time, and despite challenges at previous local plans that supply will not continue at similar rates, it has continued to do so and there is no reason to suppose that will change over the plan period. The Council has allocated its housing target in full, without reliance on windfalls, but windfalls play a part in demonstrating an appropriate additional buffer as part of a 5-year housing land supply.

The AMR demonstrates that there will be a full 5-year supply of housing land every year from submission through to 2031 with a surplus. This includes a buffer of 5% as required by the NPPF. The Council considers this is the correct buffer to apply. 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. Looking at past delivery for the current plan period 1999 to 2016 (see table below), the Council has met the annualised target applying in the adopted plan in operation at that time for four of the nine years up to the recession that took effect on housing delivery in 2008-2009 and had only a small shortfall of 40 homes for two further years. The remaining three years it had a shortfall of less than 200 homes again reflecting the effects of the economic cycle. The Council had met the annualised requirement for the three years leading up the recession and was showing good signs of continuing to deliver at the necessary levels to meet the Core Strategy target had it not been for the recession.

It is not appropriate to test against the annualised Structure Plan or Regional Plan target for the whole of the current period, as not only had the higher order plans themselves not been adopted until part way through that period, but there was then an inevitable time lag until a local plan could be put in place to implement the housing target at the local level. This is particularly relevant in a district where the last round of higher order plans introduced a major step change in housing delivery, rising from an average of 753 per annum to 1,176 per annum, that then needed to put in place through allocations in local plans. This was done as expeditiously as possible, with adopted local development documents starting to come through from 2007, despite comprehensive changes to the plan making system at that time. Completion rates were rising well and had started to exceed the annualised target by 2008 but the major worldwide recession then took hold and delivery rates were halved in a year. Recovery has been slow nationally over the last few years but major sites, particularly most of the sites on the edge of Cambridge are now starting to deliver strongly with other sites actively at the planning stage. There is every sign of that continuing and Northstowe is soon to start on site. The plan therefore appropriately allows for a 5% buffer to ensure a continuous 5-year supply of housing land.

# Approach in Submission Local Plan

### No change

Note: Amendment arising in Chapter 7 (Policy H/1) to amend Figure 3: Housing Trajectory to change the predicted housing completions for Dales Manor Business Park, Sawston, from being delivered in 2017-2021 to being delivered in 2021-2025 in recognition of the pattern of leasehold interests on the site.

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Table: Housing completions compared with annualised target in adopted plan

	1999-2000	2000-2001	2001-2002	2002-2003	2003-2004	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013
Completions	801	801	525	653	979	571	877	924	1,274	610	611	656	671	587
Adopted Annual Target - Local Plan	843	843	843	843	843	753	753	753	1176	1176	1176	1176	1176	1176
Surplus / Deficit	-42	-42	-318	-190	136	-182	124	171	98	-566	-565	-520	-505	-589
	Local Plan 1993				Local Plan 2004			Core Strategy 2007						

Monitoring( Paragi	raphs 2.68 to 2.70 and Figure 4 Monitoring Indicators)
Proposed Submission Representations Received Main Issues	Total: 4 Support: 0 Object: 4  Object
Maiii issues	<ul> <li>English Heritage - include an indicator to monitor success in protecting, and where possible, enhancing the historic environment.</li> <li>Natural England - M20 should also consider changes in the condition of biodiversity sites.</li> <li>RSPB - monitoring the effects of the Plan on internationally designated sites should seek to confirm that the amount affected by development (directly or indirectly) is nil.</li> <li>Plan should seek independent assessment of large schemes to review their quality</li> </ul>
Assessment	The Sustainability Appraisal which accompanies the plan proposes monitoring a number of Significant Effects indicators. Data is collected annually in the Annual Monitoring Report. This includes indicators relating to Listed Buildings and Heritage at Risk, and on the quality of biodiversity sites. They do not need to be repeated in the plan.
Approach in Submission Local Plan	No change

## **Chapter 3: Strategic Sites**

Paragraphs 3.1 – 3	3.3: Introductory Paragraphs
Proposed Submission Representations Received	Total: 9 Support: 3 Object: 6
Main Issues	<ul> <li>Cambridgeshire County Council – Co-location of services is best / most cost-effective way to deliver community services - in community hubs in conjunction with other public and voluntary sector partners, whilst providing space for residents for meetings / activities. Importance of Rights of Way for health and well being of residents, informal recreation.</li> <li>Support rejection of North of Cambourne SHLAA sites 194 &amp; 265.</li> </ul>
	<ul> <li>Cambridgeshire County Council – Given the size of the proposed developments, reference should be made to Minerals and Waste Core Strategy policies that relate to recycling of construction materials and waste minimisation.</li> <li>Barratt &amp; North West Cambridge Consortium – Bullet 2 should read "1,200 homes".</li> <li>Request review of Green Belt to meet objectively assessed needs and deliver sustainable development – promoting North and South of Barton Road.</li> <li>Reference to Bourn Airfield should be deleted and reference to a new village north of Cambourne added.</li> <li>Object to these sites as not enough analysis of advantages and disadvantages, loss of Green Belt and lack of plans for public transport between Cambridge and other towns.</li> </ul>
Assessment	See the substantive assessments relating to policies: S/4 Green Belt, SS/2 Land between Huntingdon Road and Histon Road, SS/5 Waterbeach New Town, SS/6 New Village at Bourn Airfield, SS/7 Northstowe Extension, and SS/8 Cambourne West.  It is not practicable or necessary to insert cross references to other statutory plans in individual policies. To do so comprehensively would be repetitious and to do so selectively would be misleading. A general cross reference to the plans making up the statutory

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	development plan for the district is provided at paragraph 1.17.
Approach in	No change
Submission	
Local Plan	

Policy SS/1 Orchar	rd Park (paragraph 3.5)					
Proposed	Total: 12					
Submission	Support: 8					
Representations	Object: 4					
Received						
Main Issues	<ul> <li>Support</li> <li>Cambridge City Council – Support section 3 concerning assessments of noise and air quality.</li> </ul>					
	<ul> <li>Natural England – Support strategic sites policies - references to environmental and ecological issues.</li> </ul>					
	<ul> <li>Support the provision of ecological features and open space in the development.</li> </ul>					
	Cambridge City Council – Support the ongoing development of Orchard Park, but consider that the final sentence of paragraph 3.5 should not refer to a landmark building as this is					
	<ul> <li>often used to denote a building of significant height.</li> <li>English Heritage – Part 2c) and paragraph 3.5 refer to gateway features and a landmark building. The scale form and massing of such a building must be appropriate.</li> <li>The Local Centre should include a public house.</li> </ul>					
Assessment	Policy SS/1 has been carried forward largely unchanged from the adopted Site Specific Policies DPD which was previously tested through examination and found sound. The reference to a landmark building is included in the adopted policy. The adopted Orchard Park SPD identifies the need for a landmark building in this location with the following wording:					
	"High quality architectural landmarks to accentuate a 'gateway' feature when approaching Orchard Park from the west."					
	and also advises:					
	"12m building height for gateway buildings"					
	This design direction is considered to remain appropriate in this location and its provisions should not be of concern to the City or					

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

Page 62 3: Strategic Sites

	English Heritage.
	Disagree that the policy should require the provision of a public house in the local centre. The NPPF includes local centres in its glossary of terms at page 57 under the heading of 'town centre' and makes clear that they are areas which will be predominantly occupied by main town centre uses. The definition of main town centre uses in the NPPF includes bars and pubs as well as retail and other appropriate uses. There is no evidence to support a requirement to provide a pub in this location, and if one were to be proposed its acceptability would be determined against plan policies including SS/1 which does not prevent such provision.
Approach in Submission Local Plan	No change

Policy SS/2: Land I 3.16, 3.18, and 3.19	between Huntingdon Road and Histon Road (paragraphs 3.14,					
Proposed	Total: 38					
Submission	Support: 15					
Representations Received	Object: 23 (including 1 from Parish Council (PC))					
	Support					
Main Issues	<ul> <li>Anglian Water – Capacity in the Water Recycling Centre, but some localised enhancement to network may be required to receive Foul Water.</li> <li>Natural England – Support strategic sites policies - references to environmental and ecological issues.</li> <li>The Wildlife Trust – Supports production of Countryside Enhancement Strategy which protects and provides ecological features. Must also consider connections to wider network. Support provision of opportunities for enhanced nature conservation and quiet enjoyment of natural environment.</li> <li>Welcome reduction in capacity of Darwin Green 2 to deliver more favourable environment at lower density and residential only on Darwin Green 3. Green fringe must be maintained. Support improved countryside access and informal recreation space. Management strategies should be applied to initial provision of facilities as well as long-term maintenance.</li> <li>Masterplan should be developed before piecemeal</li> </ul>					
	development granted. Support Darwin Green 3 delivering reduced densities.					
	Bullet 11 – If Green Belt land released, must include					

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- comprehensive landscape enhancement scheme.
- Inter-connectivity of green areas for walking, links to amenities, leisure, and retention of 'pocket parks' and trees.
- Support using green separation for walking, cycling, leisure, sports, play, 'fit trails' for adults of variable abilities, bird watching and flood attenuation ponds, linked transport routes.

#### **Object**

- Anglian Water Bullet 12 for clarity, amend sub-title to 'drainage' as it is not limited to surface water.
- Barratt and North West Cambridge Consortium (site promoters) – Support policy and allocation subject to changes to allocate a larger site including some commercial uses.
   Policy should allocate 1,200 homes in South Cambridgeshire.
- Cambridge City Council Bullet 2b/para. 3.16 Should refer to a design code rather than design guides/design codes. Important to be consistent with design code for NIAB1 should be site-wide rather than separate, as implied. Bullet 5/para 3.18 Refers to provision of off-site services and facilities within NIAB1 needs further consideration as limited space in local centre and revenue funding implications for City Council. Bullet 13 Support but concerned about air quality and noise on quality of life close to A14 should be fully investigated / resolved.
- Cambridge Past, Present and Future Object as Green Belt and not demonstrated 'exceptional circumstances' for release.
- **Defence Infrastructure Organisation** Falls within statutory height safeguarding zone around Cambridge Airport.
- Histon and Impington PC Vulnerable to flooding and drainage issues – must not put village at risk. Use noise barriers that do not cause unacceptable noise levels / reflection. Eastern access too close to Arbury Road junction. Traffic predictions too low.
- Swavesey and District Bridleways Association Horse rider needs should be included.
- Support that all 'necessary' services and facilities will be provided by development but needs defining more precisely.
   Include statement that will consider provision across whole site and work in conjunction with Cambridge City Council.
- Bullet 5 include public house.
- Develop more of the Green Belt here poor quality and more sustainable for commuting by cycle etc. Takes pressure off rural hubs.
- Green Belt performs important function preventing City merging with surrounding villages – development compromises. Take into account cumulative development.

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#### **Assessment**

The Council considers the capacity of the larger NIAB site to be approximately 1,000 dwellings. However, the policy is clear that the final capacity number will be informed by a design-led assessment and this may be higher or lower, than the approximately 1,000 dwellings that the policy allows for. The Council supports making the best use of this site at the top of the sustainable spatial development sequence compatible with achieving a quality development. The final number of homes will be determined and fixed through the planning application process. It would not be appropriate to include a higher number than is likely to be deliverable or for the plan to rely on a higher number than is robust.

Disagree that land at the immediate west of Histon Road south of the A14 should be released from the Green Belt for commercial development. This land fulfils important Green Belt purposes regarding setting, and physical separation between Cambridge and its necklace villages. It should be retained as an undeveloped green break between Cambridge and Impington as required by section 3 of the policy which refers to a set back to provide effective visual separation.

There is no evidence that the site is at risk of any significant flood risk. Policy CC/9 requires that a flood risk assessment be prepared.

Agree that the sub-title to section 12 of the policy could be clarified by amending it to refer to 'Drainage'.

Regarding the objections from Cambridge City Council no changes to the policy or supporting text are necessary. A design code is to be prepared for the land in South Cambridgeshire which will have regard to the approved design code for the land in Cambridge in order to ensure a coherent approach across the two sites.

Regarding noise from the A14, landscaped bunds of an appropriate profile are absorbent, and non reflective. The location, design and profile of such bunds are matters for consideration at planning application stage.

Regarding the needs of horse riders, agree that the Local Plan should include appropriate references. The existing Development Control DPD requires such provision. It is proposed that appropriate references are included in policy HQ/1 'Design Principles' at part f), where they would apply to all scales of housing development.

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	Further consideration is given to Green Belt issues in relation to policy S/4, and to the provision of new jobs and homes in policy S/5, and to the development strategy to 2031 in policy S/6.
Approach in	Minor change
Submission	Amend the wording of the section 12 sub-title from 'Surface Water
Local Plan	Drainage' to 'Drainage'.
	Include provision for horse riders in policy HQ/1 at criterion f) as follows:  "conveniently accessible streets routes both within the developmentdelivering attractive and safe opportunities for walking, cycling, horse riding and public transport;"

Policy SS/3: Camb	oridge East (paragraph 3.25)
Proposed Submission Representations Received Main Issues	Total: 22 Support: 9 (including 1 from Parish Council (PC)) Object: 13 (including 1 from PC)  Support
	<ul> <li>Anglian Water - Capacity in the Water Recycling Centre, but some localised enhancement to network may be required to receive Foul Water.</li> <li>Cambridge City Council – Support the approach taken in policy SS/3 which complements the equivalent policy in the City Local Plan.</li> <li>Cambridge Past, Present and Future – Support safeguarding for future development. Teversham Green Corridor should be retained as Green Belt. Park and Ride should relocate east of Airport Way. If Park and Ride unsuitable for residential – possible site for stadium for CUFC.</li> <li>Cambridgeshire County Council – Likely to require measures to mitigate transport impacts – explore in detail through Transport Assessment.</li> <li>Marshall of Cambridge (site promoter) – Intend to bring forward North of Newmarket Road in plan period. Support safeguarding of remainder of site for longer-term. Figure 7 should show longer-term proposal to relocate Park and Ride.</li> <li>Natural England – Support strategic sites policies - references to environmental and ecological issues.</li> <li>Oakington and Westwick PC – Support policy.</li> </ul>

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#### Object

- **Defence Infrastructure Organisation** Falls within statutory height safeguarding zone around Cambridge Airport.
- Ely Group of Internal Drainage Boards Site outside IDB area but must be consulted (with Environment Agency) on surface water disposal proposals.
- Highways Agency Policy should be amended to include requirement for assessment of A14 junctions 34 & 35 in Transport Assessment, to safeguard strategic road network.
- Oakington and Westwick PC New policy needed to guide development of Land North of Newmarket Road.
- Teversham PC Green Belt too narrow to perform functions if Area Action Plan carried forward, should reduce size of
  SS/3(1) to provide larger gap with Teversham and remove
  southern section. Building up to Airport Way would have
  devastating impact on openness, character, urban sprawl.
  Gazelle Way/Yarrow Way should be limit of development.
  Traffic noise from Airport Way greater than airport measures
  needed to alleviate.
- Object to safeguarding land not available for residential and uncertain availability in long-term - cannot be relied upon.
- No mention of community facilities include public house.
- Land north of Newmarket Road:
  - Taken out of Green Belt on proviso airport relocated should be put back as condition not met.
  - Roads cannot cope with extra traffic. Risk to pedestrian safety with rat running.
  - o Infrastructure cannot cope schools, nurseries.
  - Valuable agricultural land actively farmed, should be protected.
  - Proximity to airport previously rejected. Safety risk adjacent to fire testing area.
- · Land north of Cherry Hinton:
  - Valuable agricultural land.
  - Roads round Cherry Hinton cannot cope with more traffic. Regular congestion.
  - o Too near Teversham, increasing risk of coalescence.
  - o Too near airport potentially hazardous area.

#### **Assessment**

Land at Cambridge East was allocated for development and removed from the Green Belt by the Cambridge East AAP prepared jointly with Cambridge City Council and adopted in 2008. The AAP is being retained and will guide the development of two parcels of land which are to be developed within the plan period (land north of Newmarket Road and north of Cherry Hinton). Policy SS/3 in the Local Plan confirms the allocation of these two parcels in section 2 of the policy.

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Highways Agency concerns concerning the strategic road network are addressed by retained AAP policy CE/10 and especially through paragraph 6 of the policy which relates to Transport Assessments.

The current Green Belt boundary was established by the AAP after a process of consultation and public examination which took account of impacts upon Teversham and the need to retain a green corridor to the village. No compelling reasons to change the boundary have been put forward.

Regarding safeguarding, the site is a sustainable location on the edge of Cambridge and well suited to development with few constraints to development. It was identified for development through four planning processes / public examinations – the 2003 Structure Plan, the Cambridge Local Plan 2006, SCDC Core Strategy in 2007 and in the Cambridge East AAP in 2008. There is no requirement in the NPPF that safeguarded land must be deliverable, and as an allocated site can be considered to be developable within the terms of the NPPF. Its safeguarding is entirely appropriate given the intention of safeguarding to retain the potential of the site in meeting longer-term development needs stretching well beyond the plan period which is more than 15 years in the future. If it becomes available, it will be for future reviews of the Local Plan to consider whether it remains appropriate to finally allocate the site for development.

The airport site is not relied on to meet the development needs of the area in this plan period except as set out in policy SS/3. It is agreed that it is not certain at this time whether the site will become available for redevelopment in the longer term.

Other detailed objections relate to matters that were considered at public examinations before the land was taken out of the Green Belt and allocated for development, and to matters addressed by the policies of the AAP.

The AAP made clear that development could take place north of Newmarket Road with or without the airport coming forward and also that the potential of this land could be further explored as has been the case in the Local Plan.

There is no need to show the Park & Ride site on figure 7. It is addressed by the AAP and shown on the AAP concept diagram. Figure 7 is not intended to show this level of detail.

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Approach in	
Submission	No change
Local Plan	

_	oridge Northern Fringe East and land surrounding the proposed se Park Station (paragraphs 3.30 and 3.31)
Proposed	Total: 21
Submission	Support: 8 (including 1 from Parish Council (PC))
Representations	Object: 13 (Including 1 from PC)
Received	
Main Issues	Support
Main issues	<ul> <li>Anglian Water – Investment plan includes upgrades to water recycling centre by 2015 – provides capacity for growth to 2031. Should land become available, restrict uses to compatible, less sensitive development and not residential. Will advise on, but not fund, feasibility of works to reduce odour.</li> <li>Cambridge City Council – Working together to produce complementary policies. Welcome continued joint working on production of an Area Action Plan (AAP). As landowner, support. Working closely with other landowners / stakeholders on AAP – important to bring forward development in phased manner to meet demand, enhance new station area and ensure appropriate infrastructure is in place.</li> <li>Cambridgeshire County Council – Preparation of an Area Action Plan, in partnership, welcomed. Existing and proposed waste management and transport activities are essential infrastructure vital to sustainable development.</li> <li>Oakington and Westwick PC- Support policy SS/4.</li> <li>Support focus on high quality mixed-use employment-led development – appropriate given strategic location and function of site. Good fit with Waterbeach proposals in terms of balance of employment uses, availability of rail and busbased public transport and additional labour new town offers.</li> <li>New station and interchange will provide strategic infrastructure to facilitate growth. Logical to maximise employment in the area. Small scale residential development in Fen Ditton could be linked through high quality public transport, cycleways to new station, and employment area.</li> </ul>
	Object
	Brookgate (site promoter) – Not consistent with NPPF or flexible to allow for changes in market conditions. No regard to

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

- necessary infrastructure or viability. Preparation of an AAP unnecessary and would slow delivery agreed masterplan can guide development. Need a co-ordinated approach between City and SCDC. Seek inclusion of residential land uses.
- Cambridge Past, Present and Future Crucial development for future of Cambridge – must be employment-led and could create major new business district. Option for proposed CUFC community stadium. Masterplan urgently needed. Eastern boundary should be extended across railway line to the river.
- Cambridgeshire County Council Para 3.30 last sentence should be deleted as ambiguous, it is not clear if it is suggesting any waste management or transport proposals need to be compatible with existing uses, or those yet to be proposed through Area Action Plan (AAP). Para 3.31 proposals associated with aggregates railheads and ancillary uses cannot be made through AAP must be addressed through County Council's Minerals and Waste Plan.
- Defence Infrastructure Organisation Land for B1, B2 and B8 uses falls within statutory height safeguarding zone.
- Highways Agency Appropriate to prepare Area Action Plan

   include reference to involving Highways Agency to ensure
   safe and efficient operation of A14 safeguarded.
- Lafarge Tarmac Minerals and waste related operations, rail sidings and land around station should be safeguarded to ensure current operations not impacted by proposals. Para 3.31 infers production of noise and dust from existing operations will be considered in terms of their long-term viability viable operating area should be safeguarded.
- Milton PC Expect to be consulted on changes to A10/A14 junction - oppose loss of any recreation space. Infrastructure must be in place for any new development.
- The Wildlife Trust Omits mention of biodiversity, ecology and/or green infrastructure. Planning application for station identified site's importance for biodiversity. Mitigation, compensation and enhancement needed.
- Masterplan urgently needed with flexibility to overcome problem of odour from waste treatment works.
- Extend Area Action Plan boundary include land east of Milton interchange to help secure strategic highway improvements which may be needed to access site.
- No evidence site will be delivered given history of non-delivery resulting from viability issues relating to relocation of waste water treatment works, odour issues, number of landowners and relocation of existing uses. Complex brownfield site.

# Assessment

Large areas of previously developed land are available for development on the northern fringe of Cambridge including land in

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment Cambridge and South Cambridgeshire. Located close to the Cambridge Science Park and the A14, the site will soon also have access to a new Science Park railway station and an interchange with the Cambridgeshire Guided Busway. Planning permission for the new railway station was granted in December 2013 and the new station will offer excellent links to London, Norwich and Kings Lynn, as well as to the Waterbeach New Town and Ely. Its facilities will include 450 car parking spades and 1,000 cycle parking spaces. The station is planned to open in 2016.

The area is suitable for many types of development and particularly for employment development and forms a key part of the sustainable development strategy for the Cambridge area. The nature of new development will need to take into account the presence of a major water recycling centre to the north of the area and an existing aggregates railhead and associated uses.

Disagree that the proposed approach is inconsistent with the NPPF. Preparation of an AAP will allow all stakeholders to contribute to plan preparation. The policy is supported by the City Council both as a Local Planning Authority and as a key local landowner. Preparation of an AAP will not cause any substantive delays to delivery. No credible evidence has been presented regarding deliverable sites being held back. Redevelopment of the area has been included in adopted development plans for over 10 years including the 2003 Structure Plan, and the Cambridge Local Plan 2006 and the current SCDC Site Specific Policies DPD 2010).

The importance of the site for employment development was highlighted by the Councils Employment Land Review. It provides a key opportunity to add to the employment cluster on the northern fringe of Cambridge, utilising the enhanced transport links the area will benefit from. 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(subject to any mitigation measures identified through the AAP).

It is unnecessary to include a reminder in the policy of the key role of the Highways Agency. Biodiversity and related matters are addressed by policy NH/4.

It would be wrong to extend boundary of the area beyond the railway line as this could lead to the loss of a significant source of

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	existing Gypsy &Traveller accommodation in the district. This accommodation is important to meet local needs and could not be met elsewhere in the District. Policy H/19 of the Local Plan safeguards existing Gypsy and Traveller sites from alternative forms of development.
	It is not necessary to include the Teardrop site in the AAP boundary to secure strategic highway improvements. This land is retained as Green Belt to provide separation to Milton.
Approach in Submission Local Plan	No change

Figure 5: Illustration of Major Development Areas at West Cambridge, NIAB, North West Cambridge and Orchard Park	
Proposed	Total: 1
Submission	Support: 0
Representations	Object: 1
Received	
Main Issues	Object
	Barratt and North West Cambridge Consortium – Amend
	'NIAB' to 'Darwin Green'; Darwin Green Primary School should
	be notated with yellow star; northern boundary should be
	amended to reflect proposed allocation; red line around City
	area of major change should be completed.
Assessment	Agree that figure 5 should show the Primary School site located
	within Cambridge on the NIAB site that is currently missing. Agree
	that the red line should be extended to encompass the whole of
	the Area of Major Change in Cambridge. Disagree that it is
	necessary to replace the site description 'NIAB' with 'Darwin
	Green'. The former reflects historic land ownership and recent use
	whilst the later is a marketing name for the development.
	For consideration of the northern boundary change requested see
	the assessment of policy SS/2.
Approach in	Minor change
Submission	
Local Plan	Amend Figure 5 to include the missing primary School and correct
	the boundary of the Area of major Change in Cambridge.

Policy SS/5 Waterbeach New Town (paragraphs 3.34, 3.35, 3.36, 3.37 and 3.39)

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Proposed	Total: 473
Submission	Support: 42
Representations	Object: 431
Received	
-	<ul> <li>Support</li> <li>The Farmland Museum and Denny Abbey – The Abbey and Museum provide an ideal place for community activities and events.</li> <li>RLW Estates / Defence Infrastructure Organisation (DIO) (promoters) – Support the designation of Waterbeach New Town. This is consistent with the Cambridge focussed spatial strategy and will enable housing delivery through the plan period and beyond. The project has significant sustainability advantages being partly PDL, located close to Cambridge, not in the Green Belt and with excellent opportunities for public and other non-car transport accessibility. The New Town proposal has significant advantages over the other options consulted on including the small new town, and the barracks only options. Development would provide a secure long-term future for the MOD landholding to secure new homes and jobs.</li> <li>Cambridge Past, Present and Future - Support as a way of preserving the Cambridge Green Belt subject to dualling of the A10 with a bus lane to south, new railway station with good services to Cambridge and Science Park and a dedicated cycle route.</li> <li>Cambridgeshire County Council – Support subject to mitigation of transport impacts requiring some or all of the following:         <ul> <li>*A relocated Waterbeach station to serve the village and the new town, with platforms (capable of taking 12-carriage trains or 10-carriage InterCity Express trains.</li> <li>*A busway link from the station and town centre to north Cambridge including a fully segregated crossing of the A14 Trunk Road.</li> <li>*A Park &amp; Ride site on the A10 to intercept traffic from the north of Waterbeach, served by the new busway link to Cambridge.</li> <li>*Direct, segregated high quality pedestrian and cycle links to north Cambridge including to Cambridge Science Park, to Milton, Cottenham, Histon and Impington, Landbeach, Horningsea, Fen Ditton, Chittering, Stretham and the Cambridge Research Park.</li></ul></li></ul>

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- \*A Smarter Choices package including residential, school and workplace travel planning.
- **Natural England** Support references to environmental issues in the policy.
- Oakington and Westwick PC support.
- A large setting for Denny Abbey and Farmland Museum must be protected.
- Community facilities should be provided on a multi-use basis and be funded by the developer.
- The Bannold Road 'gap' must be protected as Green Belt.
- The Station must be easily accessible for village residents without needing a trip on the A10 as must the facilities and services of the new town.

#### **Object**

A high number of largely identical representations have been submitted as part of a local campaign opposed to the new town giving the following reasons:

- Objections concerning the railway station. Moving the railway station is unnecessary and a mistake. It is too far away to walk, and will generate extra traffic in the village and on the A10. Any new station needs good road access, car parking and lighting. Build a second station and keep the existing one open.
- Objections concerning the A10 and A14. Local roads are already inadequate and congested. It is not possible to widen them or provide bus lanes. Alternative routes would be harmful to the environment of Landbeach. Traffic on the roads already results in noise and pollution to Milton, these impacts need to be mitigated. Will worsen air quality. Traffic will increase in Waterbeach, need to avoid creating a rat run through the village.
- Objections concerning viability. The development will not be able to fund all the required infrastructure and remain viable.
- Objections concerning flood risk. Avoid building below the 5m contour. Will increase water runoff.
- Objections concerning employment. Inadequate provision for local employment. Will be a commuter town for Cambridge and London.
- Objections concerning impacts on the existing village. The new town will dominate the existing village, the proposed separation measures will not work and are at risk of housing development. Landscape impacts. Biodiversity impacts. Local shops will close.
- Loss of agricultural land.

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## Other objections:

- RLW Estates and DIO (promoters) Setting study shows development boundary can be slightly larger without harm to Denny Abbey. Increase capacity to 9,000 to 10,000 homes. Allow earlier start and 3,500 in plan period. Include the Bannold Road land within the AAP boundary but not as Green Belt.
- Milton PC Will oppose any loss of local recreation space to improve the A10 and the A10/A14 junction.
- The Farmland Museum and Denny Abbey The policy needs to mention the Farmland Museum and recognise that access to some areas may need to be restricted. The old causeway track from the village to the Abbey should be used to allow access by bicycle and on foot. A better road access to the Abbey and Museum is required and a new and bigger car park.
- The Wildlife Trust Too large a scale of development to commit to before formal assessment of whether it can be accommodated without harm to ecology and biodiversity.
- The National Trust Policy should refer to the need to maximise the aims of the strategic green infrastructure allocation of the Wicken Vision. This should be explored in the AAP in consultation with the National Trust and other stakeholders.
- Cambridgeshire County Council Plan should ensure proper use of any excavated sand and gravel. Criteria h) should refer to a library. Secondary school capacity must be able to accommodate pupils from the existing village. Policy should refer to early years and post-16 provision. Operation of existing waste facility in area must not be compromised.
- Environment Agency Support allocation and phasing.
   However a flood risk assessment is needed of residual risks if flood defences on the River Cam fail. If defences are relied on the development should contribute to their upkeep.
- English Heritage The setting and significance of Denny Abbey must not be harmed. Any impacts on significance must be mitigated. A setting study is required. Policy must require archaeological evaluation of the site. Under p) add reference to WW2 structures.
- Landbeach PC Concerns about viability, transport, Denny Abbey, agricultural land, contamination, landscape impacts, village impacts, station and flooding.
- Anglian Water Policy should refer to a foul drainage strategy.
- Ely Group of IDB A robust strategy for disposal of surface water is required.

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- Objections supporting a smaller scale of development. Rather than a large development allow a smaller scale of development on the barracks over the next few years to help support local shops and services that have suffered since the barracks closed. Develop the brownfield land first.
- Objections concerning the adequacy of public transport. Public transport will not be able to cope so people will continue to use cars.
- Development will also impact Landbeach and Milton.
- No mention of needs of horse riders. No mention of River Cam and need to provide good links to it for benefit of the new town residents.
- Objections concerning impact on Denny Abbey.
- Barracks and airfield are contaminated and should not be allocated until level of contamination and costs/timescale of mitigation are understood.
- Needs extra land outside of site boundary.
- Site should be developed more quickly.
- Site should not have been identified for development ahead of sites on the edge of Cambridge.

#### **Assessment**

A new town north of Waterbeach is a key part of a sustainable development strategy for the wider Cambridge area. It provides an opportunity to deliver sustainable development to help meet the housing needs of the district. 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 whilst noting that policy NH/6 already addresses the provision of, and links to, Green Infrastructure.

Agree that it would be appropriate to mention the Farmland Museum in the supporting text and at section 6 ff).

Foul drainage and flood risk assessments and are addressed by other Local Plan policies (policies CC/7 and CC/9). There is no evidence that the site is at risk of any significant flood risk. The Environment Agency who have a strategic responsibility for flood

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risk management from main rivers, and the County Council who are responsible for managing local flood risk from surface and groundwater, both support the allocation. Policy CC/9 requires that a flood risk assessment be prepared.

Education matters are addressed by policy criteria j) of the policy and by policy TI/9, and library provision by policy SC/4.

Regarding heritage, agree that it would be appropriate to include reference to WW2 structures at section 6p. Regarding archaeology the policy already requires the assessment, conservation and enhancement of other heritage assets at section 6p.

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. The SCDC CIL and Local Plan Viability Study at paragraph 3.3.32 notes that it appears highly likely that an adaptable master planning, phasing and delivery approach will be needed to help deliver this infrastructure. This will be via a S106 agreement from the developer, together with significant external funding, which 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 Cambridge was not justified. 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. The infrastructure requirements of dispersed development would be difficult to quantify and provide for and would provide a less sustainable pattern of development.

Regarding employment it is not intended that the new town match the number of jobs in the town to the number of residents although it will include substantial employment provision. Residents working elsewhere will support the economy of the wider Cambridge area and will benefit from excellent public transport links to the employment areas on the Cambridge northern fringe and in Cambridge. It adjoins an existing business park. Some residents will choose to work in London but will be able to do this by rail travel from the new station. However it is planned to meet the housing needs of South Cambridgeshire.

Regarding traffic and transport the County Council Transport Strategy for Cambridge and South Cambridgeshire demonstrates

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

that appropriate solutions to the transport impacts of the new town exist. These will be further developed in the AAP. Implementation will follow a grant of planning permission for development and would be supported by funding from the City Deal if this is agreed. The policy lists the transport measures sought by the County Council including all those in their representation.

The location of the new railway station will 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. Direct access by all modes from the existing village and good lighting and car and cycle parking are matters that can be addressed by the AAP. Regarding a second station the County Council (and Network Rail) consider that this would not be acceptable. Neither could the existing station alone provide for the new town. It has inadequate parking and this approach would mean traffic from the new town coming through the village.

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. The District Council is working with the community to seek to mitigate the immediate implications on village shops and other businesses caused by the closure of the barracks. Consideration can be given in the Area Action Plan to whether the development could include an early phase of development on the barracks site to increase demand in the village over the medium term.

Regarding impacts on the existing village these are considered to be capable of mitigation through careful Masterplanning and which will be secured through the Area Action Plan and subsequent planning applications. In time, the village will benefit from access to the services and facilities and open spaces of the new town. The Council is resisting proposals to develop for housing part of the green separation between the village and the new town that is proposed to be designated as Green Belt.

Regarding the needs of horse riders agree that the Local Plan should include appropriate references. The existing Development Control DPD requires such provision. It is proposed that appropriate references are included in policy HQ/1 'Design Principles' at part f), where they would apply to all scales of housing development.

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Land outside the development boundary is needed for the relocation of the waste water treatment works. This land is in the control of the promoters. The site for the new facility could be included as a proposal for consultation in a future update of the County Council's Minerals and Waste Plan or addressed through a planning application.

Further consideration is given to Green Belt issues in relation to policy S/4, and to the development strategy to 2031 regarding the phasing of development and alternative development options on the edge of Cambridge in policy S/6.

A minor change regarding the needs of horse riders is proposed to policy HQ/1: Design Principles.

# Approach in Submission Local Plan

#### Minor change

Add reference to the Farmland Museum in criterion 6ff:

"ff. Review the access arrangements to Denny Abbey <u>and the</u> <u>Farmland Museum</u>".

Add the words **Farmland Museum** to the 5<sup>th</sup> line of paragraph 3.36:

"....new town and a substantial green setting for the new town, Denny Abbey and Farmland Museum, and Waterbeach village."

Add a reference to WW2 structures to criterion 6p as follows:

"p. Assessment, conservation and enhancement of other heritage assets as appropriate to their significance, including non-designated assets such as Car Dyke, **World War 2 structures**, and the Soldiers Hill Earthworks".

Include provision for horse riders in policy HQ/1 at criterion f) as follows:

"...conveniently accessible streets <u>routes</u> both within the development...delivering attractive and safe opportunities for walking, cycling, <u>horse riding</u> and public transport;"

### Policy SS/6: New village at Bourn Airfield

Proposed Total: 1839
Submission Support: 22
Representations Object: 1817
Received

South Cambridgeshire Local Plan Proposed Submission Consultation Key Issues and Assessment

#### Main Issues

#### Support

- Swavesey PC Support statements regarding foul drainage and sewage disposal. Increased flood risk to Swavesey must be avoided.
- Cambridgeshire County Council Support subject to significant measures to mitigate transport impacts.
- Cambridge Past Present and Future Support subject to landscaping and public transport improvements.
- **Natural England** Support references to environmental issues in the policy.
- The Taylor Family and Countryside Properties (the promoters) – The site is deliverable and viable, as demonstrated by their concept masterplan. Bourn Airfield will not give rise to any significant landscape and visual impacts and will enhance landscape character, restoring lost landscape features.
- Brownfield land, will bring infrastructure improvements, better public transport, much needed housing, and better services and facilities.

### **Object**

• StopBAD - Planning applications have been previously considered and rejected - grounds are still valid. Insufficient local employment. Major employment centres are located in Cambridge and to north and south. Limited transport links. Site is too small to accommodate 3,500 houses at density compatible with Council policies. Bourn Airfield together with West Cambourne would create a urban swathe of development stretching nearly 5 miles along A428. Preparation of the Local Plan deviated from Government good practice for SHLAA. Plan has not given sufficient weight to NPPF sustainability requirements.

A high number of largely identical representations have been submitted as part of a local campaign opposed to the new village giving the following reasons:

- Plan will effectively create a town by stealth by coalescing villages together- new town will stretch from West Cambourne to Hardwick.
- Bourn Airfield and West Cambourne developments will create new traffic that local infrastructure can't support.
- Plan proposes too many houses in small space, which will inevitability compromise aspects such as community facilities and separation from existing settlements, and result in higher densities.
- o Plan is unsustainable- lack of local employment

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- opportunities and sustainable transport links.
- Consultation carried out by the Council was flawed. The opinions of local people have not been listened to, and the plans presented were misleading/ incorrect.
- North Hertfordshire District Council Could have traffic impacts at Royston from commuters using the train station.
- The Wildlife Trust Point m. should read "Provide a high degree of connectivity to existing corridors and ecological networks."
- Cambridgeshire County Council A Household Waste Recycling Centre is needed in the BA/Cambourne area.
   Reference to library provision needed. Policy references to secondary education are positive, but it is critical that there is sufficient flexibility within the planning of this to ensure that the new school compliments existing secondary school provision in the local area. Policy should refer to all phases of education provision.
- Environment Agency Allocation mostly justified, but a surface water attenuation strategy is needed.
- Anglian Water Policy should refer to a foul drainage strategy.
- **English Heritage** English Heritage has no objection in principle to this proposal. However, we would wish to see provision made for archaeological evaluation.
- Parish Council objections from Bourn, Caldecote,
  Cambourne, Caxton, Elsworth, Hardwick, Toft, Madingley,
  Kingston Concerns regarding traffic, flooding, impacts on
  surrounding villages and rural character, creation of ribbon
  development, pressure on services, too close to Cambourne to
  provide a viable centre, relies on delivery of infrastructure and
  past experience has shown it Is not always delivered,
  significant costs may make it unviable, relies on west
  Cambourne to support and enable development, not enough
  space to deliver housing and openspace, flawed consultation,
  poor access to railway at St Neots, no reference made to site
  governance, better alternatives have not been explored.
- Barton PC Support all housing proposals. Better link to the M11 required.
- **Great and Little Eversden PC** Should not be considered until Northstowe fully developed.
- The Taylor Family and Countryside properties (Promoters)

   An AAP is not needed, a Supplementary Planning Document would be sufficient. No Major Development Area should be defined by the Local Plan. A north west access using the Broadway can be achieved with careful design.
- Gestamp-Tallent (Owner of part of employment area on site) -

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Support inclusion of site as employment allocation; enable redevelopment to modern standards. Should not be restricted to B1 uses; approach in keeping with policy E/12, which provides for B1, B2 and B8 uses in scale with location. Recognise role in providing employment for new village and integration with new village and associated green separation proposals can be considered through Area Action Plan process. Site also has shorter term role in providing employment opportunities to meet district requirements and support local economy generally and can be developed successfully independently. Development of site should not be delayed or phased to follow proposed phasing of the Major Development Area.

- MCA Developments (Cambourne developer) No vehicular access including for public transport possible from Cambourne to the Broadway and Bourn Airfield. Unsustainable and not viable. Ribbon development, landscape impacts.
- Martin Grant Homes and Harcourt Developments –
   Development north of the A428 (Harbourne) should be preferred.
- Road improvements required as well as public transport improvements. Public transport proposals inadequate. New rail link required or guided bus link. Air quality impacts. Growth at St Neots also affects the route to Cambridge. A428 to St Neots is already inadequate and at capacity. Too far to cycle to Cambridge. Rat running through villages. Impossible to put a bus lane in on the A1303 due to houses and the American Cemetery.
- Include a bus link pass just to the north of Caldecote to serve that village better.
- Objections concerning flood risk. Bourn WWTW should not be expanded.
- Objections concerning landscape impacts. Village separation will not be effective. Impact on the Broadway. Loss of biodiversity and nature.
- Objections concerning impacts on surrounding villages
- Destruction of archaeology
- Inadequate provision for schools and other services. Must include a new supermarket. Will impact on Cambourne
- Put the development at Northstowe, Waterbeach, Hanley Grange, on edge of Cambridge, at Six Mile Bottom, at existing villages. Too much development in Cambourne area over last 15 years.
- Develop the airfield for employment use.
- Loss of agricultural land
- Add references to making provision for horse riders to the

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policy at sections m, v and w

- Loss of an airfield and associated use. Historic airfield. Petition with 99 signatures.
- Noisy industry on site will reduce residential area and capacity
- A north west access must affect the Broadway
- P&R site will reduce housing capacity
- No provision of affordable housing for local people
- Site has been considered for development in the past and rejected.

#### **Assessment**

A range of issues raised in representations on the Bourn Airfield site address strategic issues, which have been considered in the spatial strategy chapter (Policy S/6). 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. Bourn Airfield gives the opportunity to provide high quality sustainable transport links to Cambridge.

Whilst the site has been rejected previously, 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 moving forward.

The proposed Area Action Plan (AAP) is the appropriate mechanism for exploring in more detail the way that the new village will come forward, its relationship with nearby settlements, the mix of land uses, and other issues about how the site will develop as a place. The landowners are concerned that this will delay delivery of the site, but an AAP focusing on key issues can be prepared relatively quickly.

The Local Plan identifies the major development site, which will accommodate the built development on the new village, with a wider area included in the area to be addressed by the Area Action Plan. A similar approach has been taken with previous Area Action Plans within the adopted Local Development Framework.

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Landscape impacts are capable of mitigation including avoiding creating the appearance of a ribbon of development south of the A428, and ensuring effective landscaped separation from Highfields Caldecote, Bourn, and Cambourne. This will require substantial landscape buffers between the settlements and a carefully designed structural landscape for the new development, that also addresses how it is viewed in the wider landscape.

Capacity of the site was explored in the SHLAA, and there is capacity to accommodate the scale of development anticipated. Densities will vary across the whole site with scope for higher densities in the settlement centre and lower densities around the settlement edge. Average net densities across the site with a range of 30dph to 40dph have been explored. Delivering the planned level of housing would require towards the lower end of the range. The August 2013 SHLAA technical assessment demonstrates that a capacity of 3,500 homes can be achieved on 40% of the wider AAP area of 282 hectares at a density of between 30 dph and 35 dph. The promoters 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 is likely to be the delivery of transport infrastructure. As well as the value generated by the development (in the form of CIL or S106), 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. The Council will continue to work with the transport authority and surrounding authorities to address transport issues.

The Cambridge and South Cambridgeshire Transport Strategy

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includes provision of additional park and ride on the A428 corridor. It does not specify that this must be on the Bourn Airfield site, and options are being explored. The Transport Strategy also identifies capacity improvements for the A428 between Caxton Gibbet and Black Cat in the medium to long-term, and the Highways Agency is also exploring measures to improve the A428 corridor through a Route Based Strategy.

Detailed options for the north west access will need to be explored through the AAP, but the plan requires no direct road access onto the Broadway.

Development will support focused delivery of new infrastructure to support the new village, including a new secondary school, retail and other services and facilities commensurate with a Rural Centre, whilst complementing and not competing with Cambridge or Cambourne Village Centre.

The new settlement will include employment opportunities, including the redevelopment on the adjoining employment areas. Whilst not every resident is likely to be employed in the village, people working in or close to Cambridge will have the opportunity to live in the village, served by high quality public transport links with the city.

Planning permission has been granted for the redevelopment of the former TKA Tallent site, for B2, supported by B1 and B8 uses. Policy paragraph c already includes sufficient flexibility to accommodate these uses in suitable locations compatible with the wider new village. On the Policies Map the site is included within Policy SS/6 should be coloured the same as the rest of the new village allocation, rather than the employment colour. It is not addressed in a separate employment policy. A minor change is proposed to this effect.

The Council has carried out appropriate consultation through the plan making process. It was identified as an option through the issues an options consultation in 2012, prior to its inclusion in the Proposed Submission Local Plan. Issues are addressed further in the response to representations on chapter 1 Introduction.

It became apparent during the Proposed Submission consultation that a number of technical updates were needed to the SHLAA document. The SHLAA was updated and the consultation period was extended to provide a full six week period from the date the update was published to ensure full opportunity for comments to

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be made in light of these. Representors and stakeholders were advised of this. Diagrams in consultation material illustrating the site location were accurate, and the plan includes detailed maps of the site location.

Flood risk is capable of being appropriately managed, and evidence indicates that there are likely to be opportunities to reduce flood risk downstream by managing and reducing run-off from the site (consultants reports submitted by the promoters indicate potential for 60% reductions against current run off). There may also be opportunities to improve Bourn Brook, by better managing flows. The policy includes a requirement for sustainable surface water drainage measures, and it should be read alongside the policies on water quality and sustainable drainage in the Climate Change chapter, so additional detail does not need to be added to the Bourn Airfield policy which is already covered elsewhere in the plan.

The Council has worked with Anglian Water and the Environment Agency, who have confirmed that the site is capable of being appropriately served for foul drainage. The policy requires arrangements to be made for foul drainage and sewage disposal. Anglian Water has requested this be demonstrated through a Foul Drainage Strategy. A minor change is proposed to reflect this.

The County Council indicate a Household Waste Recycling Centre may be needed in this area. They are currently reviewing their position on provision across the whole county which may clarify its position. The Council will continue to work with the County Council in their role as waste planning authority.

Impacts on the County Wildlife Site can be appropriately addressed, and the site will provide opportunities for biodiversity mitigation and enhancement, and the delivery of Green Infrastructure. Green Infrastructure connectivity is not purely about ecology, therefore the change proposed by the Wildlife Trust is not supported.

Appropriate archaeological assessment is required by the National Planning Policy Framework, and is addressed elsewhere in the Local Plan.

Governance of the site has been raised as an issue by Parish Councils. The site falls primarily in the Bourn Parish, and partly in the Caldecote Parish. Like other recent major developments, arrangements for future governance of the new settlement would

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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. This may take the form of a new Parish. It is an important issue for the implementation of the new village but this is not a matter for the Local Plan.

The majority of the site is agricultural land, but there are some significant areas of previously developed land, in particular the runways. The development of agricultural land is inevitable in a rural area like South Cambridgeshire in order to meet the needs of the district, but the airfields sites provide an opportunity to utilise large sites which include significant previously developed elements.

It will be important to provide connectivity, through existing and enhanced right of way networks, and this should include consideration of bridleways. A minor change is proposed to reflect this.

# Approach in Submission Local Plan

### Minor change

Change the order of policies in the Local Plan so the policy for Northstowe (SS/7), is before Waterbeach New Town (Policy SS/5), and Bourn Airfield (SS/6) comes after so that policies for the A428 corridor are grouped together.

Add to end of policy SS/6 paragraph m – 'Provide a high degree of connectivity to existing corridors and networks, <u>including through</u> an enhanced network of footpaths and bridleways.'

Move paragraph 't' to be under heading of Significant Public Transport Improvements rather than Measures to promote cycling and walking (previously highlighted in errata).

Add to end of policy SS/6 paragraph dd – 'Arrangements for foul drainage and sewage disposal, to be explored and identified through a Foul Drainage Strategy'

Correct the Policies Map to colour the former Thyssen Krupp site as major development site, rather than the employment allocation colour.

### Policy SS/7: Northstowe Extension (paragraph 3.49)

Proposed Total: 12

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Cubmine!	Curport 4 (including 4 from Davidh Coursell (DO))
Submission	Support: 4 (including 1 from Parish Council (PC))
Representations	Object: 7
Received	
Main Issues	<ul> <li>Support</li> <li>Anglian Water - Infrastructure and/or treatment upgrades required to serve proposed growth.</li> <li>Gallagher Estates (site promoter) – Contribution to growth</li> </ul>
	reaffirmed through SHLAA and SA. Endorsed Northstowe Development Framework Document refreshes masterplan and includes extension - comprehensive approach to planning and delivery.  Oakington and Westwick PC – Support policy SS/7.
	Object
	<ul> <li>Ely Group of Internal Drainage Boards – Must continue discussions with IDB and Environment Agency through Technical Liaison Group to cover any extension.</li> <li>English Heritage – Need for archaeological evaluation should be identified in policy or text.</li> </ul>
	Homes and Communities Agency (site promoter) – Change 9,500 to 10,000 homes for consistency with Northstowe Area Action Plan. The Northstowe Development Framework
	Masterplan and Core Strategy - refers to "up to 10,000" dwellings.
	<ul> <li>Identified as reserve land in Area Action Plan. Delays with delivery mean not required in plan period - no need to allocate within Local Plan. Remain longer-term strategic reserve site.</li> <li>Site should not have been identified ahead of suitable sites on edge of Cambridge which can promote sustainable patterns of</li> </ul>
	<ul> <li>development and transport consistent with NPPF.</li> <li>3,500 houses should be added to Northstowe to the north of the guided busway, so infrastructure costs can be aggregated in one location and maximized to create a more sustainable and viable development.</li> </ul>
	<ul> <li>Whole Northstowe plan should be rescinded as the local area, including travel infrastructure, cannot sustain excessive growth.</li> <li>Damage to countryside and destroying ecology.</li> </ul>
Assessment	Agree that the Local Plan should be consistent with the adopted AAP for Northstowe with regard to dwelling capacity. The AAP was adopted following testing through examination.
	Development of the Northstowe Extension is required to enable delivery of the allocated site and may come forward for development before the end of the plan period.
	Consideration of the most appropriate development strategy for

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	the district is given in regard to policy S/6: Development Strategy to 2031.  The proposed development of homes to the north of the guided busway was considered through the SHLAA and found not potentially capable of providing residential development taking account of site factors and constraints including townscape and landscape impacts and the difficulties arising from developing beyond the busway.  Policy NH/14:Heritage Assets, requires that appropriate
	consideration be given to archaeology.
Approach in	Minor change
Submission	
Local Plan	Correct the factual inaccuracy in line 3 of the policy by deleting 9,500 and replacing it with 10,000.

Policy SS/8: Camb	ourne West (paragraphs 3.51, 3.55, 3.56, 3.60)
Proposed	Total: 566
Submission	Support: 18
Representations	Object: 548
Received	
Main Issues	Support
	Cambridgeshire County Council - Development at Bourn
	Airfield and Cambourne West is likely to require significant
	measures to be provided in mitigation of their transport impacts.
	• <b>Natural England</b> - Support references to environmental issues in the policy.
	<ul> <li>Anglian Water - Section 14. It is recommended the following is added: 'A foul drainage strategy should be prepared in liaison with statutory sewerage undertaker'.</li> </ul>
	<ul> <li>Swavesey PC - Support statements regarding foul drainage and sewage disposal. Increased flood risk to Swavesey must be avoided.</li> </ul>
	<ul> <li>Papworth Everard PC – Support section c) of the policy. To include a cycle and pedestrian bridge over the A428.</li> </ul>
	Cambridge Past, Present and Future – Support subject to preparation of a masterplan demonstrating integration with rest of Cambourne, the Business Park and the Village College. A landscape enhancement plan is required.
	Cycle and pedestrian links are essential. The A1198 junction must be improved before development as it is a major barrier

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- to cyclists and delays car journeys.
- Landscaped soil bunds to control traffic noise are a prerequisite and must be planned in advance.

#### **Object**

- MCA Developments Ltd (Site promoter) Support principle. but site should extend to Caxton Gibbet for 2,200 homes with extensive green corridors and open space. Object to inclusion of the Business Park in Cambourne West. It is not under control of MCA which would constrain delivery, but could be developed independently, delete paragraph 6. Object to employment requirements as not based on evidence of need. Object to transport requirements in section 11 as inflexible and unjustified and implying that they are the sole responsibility of the Cambourne West promoters.
- Development Securities (Business Park owner) Support allocation but object to policy requiring that residential development only comes forward after the employment development is secured in Cambourne West as this is unnecessary and unreasonable. Land south of the access road should be allowed to come forward quickly. Concerns about using the Business Park road as a main access to Cambourne West.
- Cambridgeshire County Council A HWRC is needed in the BA/Cambourne area.
- North Hertfordshire District Council Could have traffic impacts at Royston from commuters using the train station.
- The Wildlife Trust Include policy text: "Provide a high degree of connectivity to existing corridors and ecological networks."
- Objections from Parish Councils, Cambourne, Caxton,
   Caldecote, Bourn, Elsworth Transport impacts including rat
   running through villages, inadequate infrastructure, relies on
   BA to enable required transport infrastructure, poor public
   transport, distant from railway stations, impact on Cambourne,
   ribbon development and village coalescence, loss of rural
   character, unsustainable location far from jobs, better
   alternatives exist that have not been tested, loss of Business
   Park (should be retained in its current location even if site
   remains in the plan), broken promises. No reference to
   governance even though land is within Caxton. Need for youth
   provision. Inadequate open space.
- Environment Agency Needs phasing with waste water infrastructure and policy to reflect this - need to be sure that it is deliverable within Water Framework Directive limits. Need surface water strategy.

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• **English Heritage** – The need for archaeological evaluation of site should be included in the policy.

A high number of largely identical representations have been submitted as part of a local campaign opposed to the site giving the following reasons:

- Plan will effectively create a town by stealth by coalescing villages together- new town will stretch from West Cambourne to Hardwick.
- Bourn Airfield and West Cambourne developments will create new traffic that local infrastructure can't support.
- Plan proposes too many houses in small space, which will inevitability compromise aspects such as community facilities and separation from existing settlements.
- Plan is unsustainable- lack of local employment opportunities and sustainable transport links.
- Consultation carried out by the Council was flawed. The opinions of local people have not been listened to, and the plans presented were misleading/ incorrect.
- Objections concerning impacts on traffic and local roads and congestion. Road to St Neots will not be able to cope.
   Roundabout at the junction of the A1198 and the A428 inadequate. Inadequate public transport. 4,000 homes planned at St Neots.
- Swansley Wood Farm indents the boundary of the allocation.
   Site owner objects and requests that the farm should be included in the development boundary for residential.
- Objections concerning the Business Park. Keep employment together in one location. Loss of land for employment.
- Objections that the location is unsustainable. Poor access to jobs. Inadequate retail provision. Poor access to railway stations.
- Objections that the infrastructure and services and facilities in Cambourne will not cope. That Cambourne will become a town. That development will be too dense and so compromise delivery of community facilities. Cannot be integrated into the rest of the village properly. Departs from original concept.
- Impact on landscape and setting.
- Impact on surrounding villages. Site is located within Caxton Parish
- Any east—west rail link from Bedford to Cambridge must service Cambourne and Bourn Airfield with one or more new stations
- Policy should include provision for bridleways in points 6, 11c and 11i.

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- Consider alternatives such as Hanley Grange, Six Mile Bottom,
   Northstowe, on the edge of Cambridge, in the villages.
- Will increase flood risk to local villages.
- Will not be viable, relies on Bourn Airfield for transport improvements.
- Loss of agricultural land.

#### **Assessment**

A number of issues raised in representations on the Cambourne West site raise strategic issues, which have been considered in the spatial strategy chapter (policy S/6). 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 is 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 transport links to Cambridge.

The site is capable of being effectively integrated with Cambourne particularly by making use of the access road to the Business Park and development will make the location of Cambourne Village College more central to the overall village, and make best use of access to this key local facility. Residential on the current remaining land in the business park would help integrate the new village with displaced employment replaced in the northern part of the new site, providing scope for a wider range of employment, an issue identified in the Cambourne Retail and Employment Study. The policy requires new employment to be secured in advance of the development of the business park for housing, in order to ensure that employment opportunities are not lost.

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 site. As a logical rounding off of the site, that simply incorporates existing built uses into the site, a minor change is proposed to include this land within the site boundary.

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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. It includes consideration of other growth on the corridor, including at St.Neots. Significant public transport improvements along the A428 corridor are proposed. 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 along this corridor to Cambridge.

The policy establishes that the development will provide for the additional travel demands generated. A coordinated strategy for improvements on the A428 corridor will be required, with appropriate contributions from this site. The policy establishes measures that will be required to be addressed. The biggest issue for this site is likely to be the delivery of transport infrastructure. Viability has been explored in evidence prepared to accompany the plan. As well as the value generated by the development (in the form of CIL or S106), there are other sources of funding that will help deliver the development strategy, in particular the City Deal if approved.

The development will provide or contribute to the improvement of facilities to meet the needs generated, and will support the continued development of the village as a Rural Centre. A new Local Centre will be needed for Cambourne West itself.

The County Council indicate a Household Waste Recycling Centre may be needed in this area. They are currently reviewing their position on provision across the whole county which may clarify its position. The Council will continue to work with the County Council in their role as waste planning authority.

Flood risk is capable of being appropriately managed. The policy includes a requirement for sustainable surface water drainage measures, and it should be read alongside the policies on water quality and sustainable drainage in the Climate Change chapter. The policy requires arrangements to be made for foul drainage and sewage disposal. Anglian Water has requested this be demonstrated through a Foul Drainage Strategy. A minor change is proposed to reflect this.

Appropriate archaeological assessment is required by the National

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Planning Policy Framework, and is addressed elsewhere in the Local Plan.

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.

The site does comprise agricultural land. The development of agricultural land is inevitable in a rural area like South Cambridgeshire in order to meet the needs of the district, given the limited previously developed land available. The Local Plan does utilise previously developed land in a number of other major developments.

The Local Plan will require delivery of openspace, and Green Infrastructure, to meet the needs of the new development and enhance Cambourne's Green Infrastructure network. It will be important to provide connectivity, through existing and enhanced right of way networks, and this should include consideration of bridleways. A minor modification is proposed to reflect this. Green Infrastructure connectivity is not purely about ecology, therefore the change proposed by the Wildlife Trust is not supported.

The Council has carried out appropriate consultation through the plan making process. It was identified as an option through the issues an options consultation in 2012, prior to its inclusion in the Proposed Submission Local Plan. Issues are addressed further in the response to representations on chapter 1 Introduction.

It became apparent during the Proposed Submission consultation that a number of technical updates were needed to the SHLAA document. The SHLAA was updated and the consultation period was extended to provide a full six week period from the date the update was published to ensure full opportunity for comments to be made in light of these. Representors and stakeholders were advised of this.

A larger site extending all the way to the A1198 and Caxton Gibbet roundabout was considered through the plan making process but rejected. This was to address wider landscape impacts and

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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. The importance of keeping land open in this locality was previously identified by the inspector who dismissed an appeal for one of the new village options considered in the run up to the approval of the original Cambourne outline planning permission. This took account of its prominence in the wider landscape.

The local character of the 'western claylands' of South Cambridgeshire is of gently undulating arable farmland, the topography of which is divided by broad, shallow valleys. Within this area settlements are either located on the sides of small valleys, along spring lines, or on slightly elevated ground within broad valleys (District Design Guide: High Quality and Sustainable Development in south Cambridgeshire, Adopted March 2010). The settlements are primarily viewed at a distance, across fields, on the lower land on the valley sides.

The importance of keeping land open in this locality was previously identified by the inspector who recommended refusal of a 'called in' application for one of the new settlement options considered in the run up to the approval of the original Cambourne outline planning permission because of its prominence in the wider landscape. The Inspector's recommendation was accepted by the Secretary of State.

South of Caxton Gibbet the land falls southwards towards Caxton. A shallow valley runs north east to south west in the vicinity of Swansley Wood Farm and towards the Caxton roundabout. From that valley the land rises to a ridge of the higher land to the east. The buildings associated with Swansley Wood Farm, viewed from the A428 and A1198, reflects the character of local settlements viewed across agricultural fields. Any proposed development in this area would be more characteristic of the local context if it was restricted to the east side of the valley, where it would appear to be on the side of the valley slope, with distance views across open fields towards the new village. The impact of new development can be further softened with screen planting on the edge. Visually development should not extend further west than Swansley Wood Farm.

Between the western edge of Cambourne and Oak Tree Cottage (one of a small group of buildings south of the A428) the A428 is at the same level as the adjacent fields proposed for development, and in places higher, making any development to its south far

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more visible and closer than local settlement characteristics. To the west of Oak Tree Cottage the proposed development site is partially screened by the planting alongside the old alignment of the A428. At Cambourne itself the A428 is in a cutting at a lower level than the development, in which context the screen mounding and planting there appears as an extension of the cutting embankment. To the west of Cambourne, any landscape mounding to screen the proposed development would be large and obviously an artificial device, uncharacteristic of the wider area to the west. The buildings associated with Swansley Wood Farm, viewed from the A428, resemble the appearance of local settlements viewed across agricultural fields, suggesting that visually any new development should not be closer to the A428 than Swansley Wood Farm.

A limited extension of the Cambourne Business Park westwards would be acceptable to the west of the business park and northeast of the secondary school. This area is screened from the A428 to the east by the existing peripheral planting for Cambourne, reducing the visual impact of any potential development there. However from the west this area is visible and presents the opportunity to create a built edge to Cambourne which steps down to the west creating a settlement edge that is more characteristic in scale and mass to the local settlement pattern. To prevent uncharacteristic visual intrusion into the landscape any larger units should be located away from the northern and western boundaries, with smaller units on the new village edge.

Along the north side of the A1198 Caxton Bypass to the west of the roundabout at the southern entrance to Cambourne, there is a landscaped buffer strip providing visual containment to the existing village. This could be extended westwards along the rest of the northern side of the A1198 up to the roundabout to the north of Caxton. Here the A1198 is in shallow cutting and any additional screen mounding and planting would not be incongruous.

# Approach in Submission Local Plan

#### Minor change

Amend the boundary shown on the Proposed Submission Policies Map to include the Swansley Wood Farm buildings within the major development site boundary.

Add to end of policy SS/8 paragraph 14 – 'Satisfactory arrangements being made for foul drainage and sewage disposal, to be explored and identified through a Foul Drainage

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### Strategy'

Add to end of policy SS/8 paragraph 2 – 'This setting will provide part of the publicly accessible green infrastructure of the settlement, and be well connected to Cambourne's existing green network and the wider countryside, <u>including through an enhanced network of footpaths and bridleways</u>.'

Amend paragraph 3.50 last sentence — 'The Development must also ensure that it will remain physically separate from Caxton village (the majority of the site falls within Caxton Parish).'

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# **Chapter 4: Climate Change**

Paragraphs 4.1 – 4	.5: Introductory Paragraphs
Proposed	Total: 4
Submission	Support: 1
Representations	Object: 3
Received	
Main Issues	Support
	Agree with paragraph 4.1.
	Object
	<ul> <li>The science quoted in this section is out of date and can be shown to be mostly if not entirely invalid.</li> </ul>
	<ul> <li>Actions by the UK will not have a measurable effect on slowing climate change.</li> </ul>
	Gamlingay Community Turbine - Paragraph 4.4 should
	mention community renewable energy projects as a means of reducing carbon dioxide emissions.
Assessment	The Planning Act 2008 and the National Planning Policy
	Framework require local planning authorities to address climate
	change.
	Paragraph 4.4 lists the integration of renewable and low carbon energy technologies within a building(s) as a measure that will
	contribute to reducing greenhouse gas emissions and protecting our residents and businesses from the consequences of climate change. Community renewable energy projects will also contribute
	to these aims, and therefore should also be listed.
Approach in	Minor change
Submission	
Local Plan	Amend the forth bullet point of paragraph 4.4 to read:
	'integrating renewable and low carbon energy technologies
	within a building(s) or delivering community renewable energy
	projects;'

Policy CC/1: Mitigation and Adaptation to Climate Change (and paragraphs 4.6 – 4.12)	
Proposed	Total: 17
Submission	Support: 12
Representations	Object: 5

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Received	
Main Issues	Support
	Natural England – welcomes chapter and policies requiring
	development to demonstrate and embed principles of climate
	change and adaptation.
	RES Group (UK and Ireland) – supportive of overall aims.
	Oakington & Westwick Parish Council – support paragraph
	4.12.
	<ul> <li>Essential if we are to slow climate change down and survive in future. Without strict measures we will be ill prepared for changes to our climate.</li> </ul>
	<ul> <li>Crucial aspect of building sustainable developments. New developments should absolutely be part of the solution, not contributing to the problem.</li> </ul>
	Should help promote low energy housing and developments sympathetic to surrounding environment.
	<ul> <li>Design and transport policies are vitally important. All development must be linked to existing settlements by paths, cycleways, buses etc. not just roads.</li> </ul>
	Object
	<ul> <li>Home Builders Federation – unnecessary because developers are required to meet Building Regulations. This is not a planning matter.</li> </ul>
	Environment Agency – support but needs more information on adaptation. Update plan's assumptions with summary
	effects of climate change and include these in the justification.
	<ul> <li>Support requirement for Sustainability Statements but need for clarification of requirements to be included. Prepare an SPD for Sustainable Design and Construction.</li> </ul>
	<ul> <li>Requirements for zero emissions by 2016 for residential and 2019 for commercial should be incorporated into Policy CC/4.</li> </ul>
Assessment	The Planning Act 2008 requires local planning authorities to
	include policies in their local plans designed to secure
	development and use of land that will contribute to the 'mitigation'
	of, and 'adaptation' to, climate change. The National Planning
	Policy Framework requires that local planning authorities adopt
	proactive strategies to mitigate and adapt to climate change. The
	Council has therefore included Policy CC/1 in the Local Plan.
	This chapter includes in paragraph 4.1 a brief summary of the
	effects of climate change and in paragraphs 4.10 and 4.11 lists the
	issues to be considered when mitigating and adapting to climate
	change. However, the Environment Agency has provided links to their published information on: 'Climate Ready' – a set of tools and

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information to help live with the changing climate; guidance on adaptation; and maps showing detailed climate change information for each river basin district. This information may be useful to applicants in developing their proposals and therefore the Local Plan should include a new paragraph (after 4.11) outlining that this information is available and providing links.

Policy DP/1 in the adopted Development Control Policies DPD requires Sustainability Statements to be submitted with planning applications for major developments. The District Design Guide SPD includes guidance on what should be considered. The revised District Design Guide will therefore include updated guidance on what should be included in the Sustainability Statements that are required in Policy CC/1 for all planning applications. For clarity, explain in the supporting text of Policy CC/1 that the District Design Guide SPD will provide guidance on what should be included in Sustainability Statements.

There are planned changes to Building Regulations that will progressively improve the energy efficiency requirements of new homes. The first change was anticipated to come into force in October 2013, and would have changed the requirement for energy efficiency to correspond roughly with the carbon reduction requirements of CfSH Level 4. This change is now expected to come into force in April 2014. A further change is anticipated in 2016 to change the Building Regulations requirement for energy efficiency to roughly correspond with the carbon reduction requirements of CfSH Level 5. Achieving increased energy efficiency standards beyond those included in Building Regulations would increase costs and could impact on the viability of the development. It is therefore considered that the changes to Building Regulations offer the most appropriate approach for the district for energy efficiency.

## Approach in Submission Local Plan

### Minor change

Add to the end of paragraph 4.9:

'... Further guidance on what should be included in a Sustainability Statement will be provided in the review of the District Design Guide SPD.'

Add a new paragraph after paragraph 4.11 to read (and renumber the remaining paragraphs):

To help local authorities, businesses and other organisations to consider the impacts of climate change and appropriate adaptation, the Environment Agency has published 'Climate

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Ready' - a set of tools and information to help live with the changing climate, guidance on adaptation, and maps showing detailed climate change information for each river basin district (using data from the UK Climate Change Projections 2009).

Add the following to the list of documents in Appendix A:

**Climate Ready** 

Adaptation Planning

Climate Change Information for each River Basin District **UK Climate Change Projections 2009** 

A minor change is proposed to recommend the use of BREEAM Communities Assessment as a means of assessing the sustainability of new developments in Sustainability Statements, in a new paragraph after 4.11 in response to representations made to Policy HQ/1 in Chapter 5.

Policy CC/2: Renev – 4.15)	vable and Low Carbon Energy Generation (and paragraphs 4.13
Proposed	Total: 21

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Submission
Representations
Received

Total: 21

Support: 6 (including 1 from Parish Council (PC))

Object: 15 (including 1 from PC)

### Main Issues

### Support

- Natural England welcomes chapter and policies encouraging renewable and low carbon energy development.
- English Heritage supports protection given to heritage assets and their settings.
- Oakington and Westwick PC support bullet point 2.
- Good effort as leaves door open to application for two or more wind turbines less than 2km from dwellings. Any modification to make planning approval more restrictive should be resisted.
- Proof for a shorter separation distance must be stringent.

### Object

Cambridge Past, Present and Future – policy too weak in relation to community consultation. Propose change to (d) to read: "Developers have consulted effectively with the local community and can demonstrate that they have responded positively by amending the proposed development appropriately."

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- Chancellor, Masters and Scholars of University of Cambridge – should allow renewable and low carbon generation as an off-site (allowable) solution with direct connection to associated development or community projects. Amend policy to: "b. The development can be connected efficiently to existing national energy infrastructure, or by direct connection to associated development or community project, or for onsite needs."
- Defence Infrastructure Organisation concerns over implementation of biomass, solar heating, photovoltaic cells and wind turbines due to potential impacts on air traffic operations. Understand requirement to implement carbon neutral facilities to tackle climate change, therefore MOD wish to be consulted during the planning consultation process.
- Engena Limited, Gamlingay Community Turbine, RES
  Group (UK and Ireland) and Gamlingay Environmental
  Action Group no scientific or justifiable basis to implement
  arbitrary 2km separation distance. Contradicts NPPF. Planning
  Practice Guidance for renewable and low carbon energy (July
  2013) rules out local government policies setting separation
  distances of this sort. Likely to prevent developments would
  significantly constrain potential land available. Environmental
  Impact Assessments establish whether significant effects are
  likely and if so, acceptable.
- RES Group (UK and Ireland) decisions on decommissioning need to be made at end of project life having regard to circumstances at the time.
- Home Builders Federation policy too prescriptive, not consistent with proposed changes in Building Regulations and definition of Allowable Solutions. Delete 1(b).
- Bourn PC in favour of renewable energy generation as long as it does not lead to cumulative adverse impact on landscape.
   Add a criteria on the loss of high quality agricultural land.
- The policy is too weak and does not give adequate protection to local communities from inappropriately sited developments. New wind farms should only be approved when the actual energy supply justifies the disruption and impact on local communities and the landscape. Amend policy and add an additional criteria: "Planning permission ... will be approved only when the development: a. can demonstrate that the actual amount of energy provided, as opposed to the theoretical maximum supply, justifies the impact of the development on local communities and on the landscape; ..."
- Policy should be technology agnostic. Important not to be prescriptive, but ensure flexibility that enables greater use of allowable solutions to ensure that robust and secure energy

- generation is available to residents. Amend policy to seek detailed assessment of development proposals on a scheme by scheme basis, with decisions undertaken based upon the feasibility and viability of each development meeting nationally adopted standards and not extended local standards.
- Not robust enough default should be approval of renewable energy generation both large and small scale unless a very strong case can be made against it.
- 'Provision' should include full cost allowance for decommissioning. Amend policy to: "c. Provision is made in the business plan that supports the proposed development for the full cost of decommissioning once the operation has ceased with the removal of all facilities and the restoration of the site, including a clear statement as to how the funds for the decommissioning are to be set aside during the productive life of the facility."
- Wind turbines are extremely inefficient and expensive ways of generating energy – completely unnecessary whilst creating audible and visual nightmare. Refuse all planning permissions for wind turbines.

#### Assessment

The National Planning Policy Framework states that local planning authorities should deliver renewable and low carbon energy in their area by designing policies to maximise provision while ensuring adverse impacts are satisfactorily addressed. Policy CC/2 does this by stating that planning permission will be permitted provided that the development does not have unacceptable adverse impacts on heritage assets, natural assets, the landscape or the amenity of nearby residents. It also requires that the energy generated is used efficiently, provision is made for decommissioning, and that the local community have been engaged effectively. The Council's adopted planning policy for renewable energy, included in the Development Control Policies DPD, has been revised to reflect the guidance in the National Planning Policy Framework.

Agricultural land could be considered to be a natural asset and therefore the policy already protects it from unacceptable adverse impacts. Agricultural land is also protected under Policy NH/3. This policy therefore does not need to specifically mention the protection of agricultural land.

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. However, the policy allows for a shorter distance to be considered if the

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applicant can prove that the proposal will not adversely affect local residents.

The policy requires developers to engage with the local community and local authority in an effective way. It is not appropriate to require developers to demonstrate that they have responded positively to the comments received by amending the proposed development. However, developers should consult with local communities in a meaningful way, consider the comments received, and where appropriate amend their proposal. As part of the supporting documentation submitted with any planning application, the Council would expect the developer to demonstrate how their proposal has met the criteria outlined in the policy, including considering the comments received from the community or the local authority prior to the submission of the planning application.

It is important that plans for decommissioning are made when the proposal is being considered to ensure that once the operation has ceased the redundant facilities are removed and the site is restored within an agreed timescale. The National Policy Statement for Renewable Energy Infrastructure (July 2011)<sup>1</sup> requires that the Infrastructure Planning Commission includes a condition on any consent for on-shore wind farms to secure the decommissioning of the generating station after the expiration of its permitted operation to ensure that inoperative plant is removed (see paragraph 2.7.16). Planning practice guidance for renewable and low carbon energy (July 2013)<sup>2</sup> states that local planning authorities should consider using planning conditions to ensure that redundant turbines are removed when no longer in use and land is restored to an appropriate use (see paragraph 45). The Local Plan is therefore consistent with this guidance by requiring in the policy that provision is made for decommissioning once the operation has ceased.

The National Planning Practice Guidance sets out the statutory consultees for planning and heritage applications and also non-statutory consultees that are identified in national planning policy or guidance<sup>3</sup>. The Ministry of Defence (MOD) is listed as a non-statutory consultee and the requirements for when it should be

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<sup>&</sup>lt;sup>1</sup> https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/37048/1940-nps-renewable-energy-en3.pdf

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/225689/Planning\_Practice\_Guidance\_for\_Renewable\_and\_Low\_Carbon\_Energy.pdf

http://planningguidance.planningportal.gov.uk/blog/guidance/consultation-and-pre-decision-matters/table-1-statutory-publicity-requirements-for-planning-and-heritage-applications/

	consulted are set out in 'Planning practice guidance for renewable and low carbon energy' (July 2013) <sup>4</sup> . It is not appropriate for new consultation requirements to be specified in the Local Plan; however new local consultation requirements for wind farms, solar
	farms and biomass proposals can be implemented with agreement of the Council by contacting the Development Control Manager.
Approach in Submission Local Plan	No change

Policy CC/3: Renewable and Low Carbon Energy in New Developments (and paragraphs 4.16 – 4.17)	
Proposed	Total: 20
Submission	Support: 3 (including 2 from Parish Council (PC))
Representations	Object: 17 (including 4 from PC)
Received	
Main Issues	Support
	Natural England - welcomes chapter and policies encouraging
	renewable and low carbon energy development.
	Oakington and Westwick PC – support bullet point 3.
	Object     Chancellor, Masters and Scholars of University of     Cambridge – not consistent with Cambridge Local Plan which     proposes change away from Merton-style policy to minimum
	standards. University supports in principle City's change in approach. Policy should be amended to be consistent with City.
	Defence Infrastructure Organisation - concerns over implementation of biomass, solar heating, photovoltaic cells and wind turbines due to potential impacts on air traffic operations. Understand requirement to implement carbon neutral facilities to tackle climate change, therefore MOD wish to be consulted during the planning consultation process.
	Home Builders Federation – inconsistent with national policy and planned changes to Building Regulations. How developers meet these is a matter for them to decide. Delete policy.
	Bourn PC – in favour of renewable energy generation becoming integral part of all new developments – scale should

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/225689/Planning\_Practice\_Guidance\_for\_Renewable\_and\_Low\_Carbon\_Energy.pdf

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- be decided on site by site basis rather than a specific policy. Should include criteria concerning standards of insulation.
- Caldecote and Cambourne PCs in light of NPPF, reduction in carbon emissions should be set at 20%.
- Oakington and Westwick PC larger scale development should have zero carbon standard (Code for Sustainable Homes Level 5).
- Requirement to reduce emissions by 10% compared to Building Regulations is unworkable and not viable. To achieve only through on-site technologies is too restrictive. Policy inconsistent with energy hierarchy. Amend policy to delete reference to 10% reduction, and replace with reference to 'energy hierarchy' that also includes fabric efficiency and allowable solutions to ensure compatibility with evolving national policy. Also amend bullet point 3 to allow use of a range of technologies including on-site generation, subject to technical and economic viability.
- Inconsistent with requirements in Northstowe AAP and DFD.
   Clarity is required in Council's intentions on whether policies in Local Plan will supersede those in older policies in AAP and DFD.
- Approach is out of step with Government policy. Should be for industry to determine how best to comply with Building Regulations. Site wide solutions only work in city centres or metropolitan areas.
- Policy is an unreasonable burden on development that is not justified by national policy. Housing Standards Review states that Government considers that the progressive strengthening of Building Regulations means it is no longer appropriate for local plan policies to specify additional standards for how much of the energy use of new homes should come from onsite renewables.
- Need for flexibility is paramount as technology is moving rapidly and not all development will be able to achieve 10% having regard to site circumstances and financial viability. Amend bullet point 1 of policy to: "Proposals ... will be required wherever possible to reduce carbon emissions (over the requirements set by Building Regulations) by a minimum of 10% through the use of on-site renewable energy technology, unless evidence is presented to demonstrate in any individual case that this is not feasible."
- Appreciate that it is preferential for renewable energy technologies to be accommodated on site, however policy does not allow for offsite solutions that may be more appropriate in some cases. Need more flexibility in policy. Add an additional sentence to end of bullet point 1: "Where an on-

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site solution is not considered feasible an off-site solution may be considered more appropriate."

### **Assessment**

The National Planning Policy Framework states that to increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. The NPPF also recognises that small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.

The Council's adopted planning policy on renewable energy technologies in new developments (included in the Development Control Policies DPD where it was found sound through the examination) has been updated to take account of the recommendations in the Council's evidence base document (Review of Merton Rule-style policies in four Local Planning Authorities in Cambridgeshire, June 2012).

The study states that there is a strong case to be made for retaining Merton rule-style policies in the run up to the zero carbon standard being introduced, especially as the reasons for encouraging renewable energy capacity have increased e.g. energy security, fuel poverty, reduction in carbon emissions. The study recommends a revised technology specific policy but demonstrates that 10% remains an achievable and reasonable target for South Cambridgeshire. Based on the recommendations in the study and having considered a range of options and their associated representations, the Council has chosen to take a different approach to that taken by Cambridge City Council. The South Cambridgeshire approach is to:

- include a Merton rule-style policy requiring new developments to generate a proportion of their energy required from onsite renewable or low carbon sources in the Local Plan; and
- rely on planned changes to Building Regulations to progressively improve the energy efficiency requirements of new homes. Building Regulations also set out requirements for insulation.

The Local Plan in the strategic site allocation policies (see Chapter 3) requires Waterbeach New Town, Bourn Airfield New Village and Cambourne West to exceed the minimum sustainable design and construction standards set out in the climate change chapter of the Local Plan.

The policy refers to site wide solutions, and gives renewable and low carbon district heating systems as an example. These are not the only site wide solutions and alternative site wide solutions

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The National Planning Policy Framework states (in paragraph 96) that in determining planning applications, local planning authorities should expect new development to comply with adopted Local Plan policies unless it can be demonstrated that this is not feasible

would be considered by the Council.

or viable. Additionally, evidence demonstrating that a policy would make a proposal not viable would be a material planning consideration when determining an application. It is therefore not necessary for this specific policy to include wording on viability.

The Government is currently considering the responses to its consultation document: 'Housing Standards Review' (August 2013) and has not yet made any final decisions. The Council considers that its evidence base document justifies the inclusion of this policy.

The National Planning Practice Guidance sets out the statutory consultees for planning and heritage applications and also non-statutory consultees that are identified in national planning policy or guidance<sup>5</sup>. The Ministry of Defence (MOD) is listed as a non-statutory consultee and the requirements for when it should be consulted are set out in 'Planning practice guidance for renewable and low carbon energy' (July 2013)<sup>6</sup>. It is not appropriate for new consultation requirements to be specified in the Local Plan; however new local consultation requirements for wind farms, solar farms and biomass proposals can be implemented with agreement of the Council by contacting the Development Control Manager.

Clarity has been sought by the Homes and Community Agency as to the role the existing policies in AAPs have as opposed to the new renewable energy policies in the Local Plan. The Northstowe AAP remains part of the statutory development plan for South Cambridgeshire alongside the Local Plan. The Proposed Submission Local Plan clarifies at Appendix B that only Policy NS/3 (1g) is superseded by the Local Plan. The Local Plan will include more recently adopted policies and the Council will weigh the appropriate weight to give to individual policies in both plans in determining any applications for Northstowe.

# Approach in Submission

No change

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/225689/Planning\_Practice Guidance for Renewable and Low Carbon Energy.pdf

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<sup>&</sup>lt;sup>5</sup> <a href="http://planningguidance.planningportal.gov.uk/blog/guidance/consultation-and-pre-decision-matters/table-1-statutory-publicity-requirements-for-planning-and-heritage-applications/">http://planningguidance.planningportal.gov.uk/blog/guidance/consultation-and-pre-decision-matters/table-1-statutory-publicity-requirements-for-planning-and-heritage-applications/</a>

Local Plan	

Policy CC/4: Susta	ainable Design and Construction (and paragraphs 4.18 – 4.21)
Proposed	Total: 13
Submission	Support: 2
Representations	Object: 11 (including 1 from Parish Council (PC))
Received	
Main Issues	Support
	Natural England - welcomes chapter and policies requiring
	development to promote and ensure sustainable construction.
	Needs careful monitoring.
	Object
	<ul> <li>Cambridge Past, Present and Future – should include clear immediate commitment to Level 5 in compliance with changes to Building Regulations. Amend policy to: "All new developments will accord with the changes to the Building Regulations with all new residential developments meeting CfSH Level 5 by 2016 and all new non-residential developments meeting CfSH Level 5 by 2019."</li> <li>Chancellor, Masters and Scholars of University of Cambridge – not consistent with Cambridge Local Plan which proposes policy linked to minimum standards for sustainable construction, carbon reduction and water efficiency. University supports in principle City's change in approach. Policy should be amended to be consistent with City.</li> <li>Environment Agency – support policy, but minor updating needed on water stress status. Amend first sentence of 4.20 to: "The Cambridge Water company is in an area of water stress</li> </ul>
	<ul> <li>as designated by the Environment Agency."</li> <li>Home Builders Federation – as policy exceeds Building Regulations it is necessary for Council to assess cost to ensure does not jeopardise viability. Once forthcoming changes to Building Regulations are factored in viability becomes more precarious. Consider the case for a policy specifying Code 4 not been proven and unnecessary in light of planned changes to Building Regulations.</li> <li>Oakington and Westwick PC – all new residential developments must achieve Level 5 or better water efficiency.</li> <li>New policy on water neutrality. Area designated as water</li> </ul>
	stressed and lowest rainfall in country. Must ensure that no more water is abstracted, treated and delivered for business

- and/or domestic use than before the new dwellings were built.
- In ensuring development is as sustainable as possible, the Council should look to introduce a fixed percentage of 'passiv' design housing. Would like 'exemplar' schemes in each major development with at least 10% 'passiv' design.
- Control of building sustainability should be restricted to national standards at time of application / decision making. Higher levels of water minimisation could be achieved through an Allowable Solutions or water neutral concept, where existing homes in the neighbourhood could be upgraded to help mitigate the impact of the new development.
- Designated area of water stress the need for appropriate and sufficient water supplies has not been given sufficient emphasis in the past and it is an issue of wider significance than within South Cambs alone.

### **Assessment**

There are planned changes to Building Regulations that will progressively improve the energy efficiency requirements of new homes. The first change was anticipated to come into force in October 2013, and would have changed the requirement for energy efficiency to correspond roughly with the carbon reduction requirements of CfSH Level 4. This change is now expected to come into force in April 2014. A further change is anticipated in 2016 to change the Building Regulations requirement for energy efficiency to roughly correspond with the carbon reduction requirements of CfSH Level 5. Achieving increased energy efficiency standards beyond those included in Building Regulations would increase costs and could impact on the viability of the development. It is therefore considered that the changes to Building Regulations offer the most appropriate solution for the district for energy efficiency. To reflect this change, update the references to 2013 in paragraph 4.19 to 2014.

The policy does require water efficiency standards beyond those required by Building Regulations. The additional reduction in water use in residential developments necessary to achieve the policy requirement of 105 litres per person per day (equivalent to Code for Sustainable Homes Level 4) can be achieved at low additional cost. It is considered necessary and justified as the district is in an area of water stress being in the driest part of the UK. The policy also includes similar improvements based on the BREEAM standard for non-residential buildings. There are no planned changes to the water efficiency standards required by Building Regulations. The Council's adopted planning policy on water conservation (included in the Development Control Policies DPD where it was found sound through examination) has been updated to take account of nationally recognised assessment standards.

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The costs of achieving higher levels of water efficiency were explored in the Cambridge Area Water Cycle Strategy 2011.

Reducing water consumption to 105 litres per person per day adds a minimal cost of £268 per property and can be achieved through the use of alternative fixtures and fittings that use less water. Costs for increasing the water efficiency of new non-residential buildings were not included in the Water Cycle Strategy, however, the policy requirement to achieve the BREEAM standard of 2 credits for water use can be achieved through the use of water efficient fixtures and fittings and therefore at minimal cost.

After considering a range of options, and the significantly higher costs versus the benefits, South Cambridgeshire has chosen a different approach to water efficiency than that chosen by Cambridge City Council. The South Cambridgeshire approach balances costs with achieving higher standards than Building Regulations.

The Local Plan in the strategic site allocation policies (see Chapter 3) requires Waterbeach New Town, Bourn Airfield New Village and Cambourne West to exceed the minimum sustainable design and construction standards set out in the climate change chapter of the Local Plan.

Water neutrality would involve offsetting water demand of development through efficiency reductions elsewhere. Whilst there may be opportunities to explore the concept as part of major developments, through the opportunities to exceed standards referred to in the strategic site policies, it is not considered appropriate to apply this as a district wide requirement, due to the potential high costs, difficulties in implementation, and the overall availability of water supply during the plan period.

To achieve the PassivHaus standard the building must have a low heating demand and this is achieved through the use of mechanical ventilation and by designing and constructing the building to have a high thermal performance and high levels of airtightness. The Local Plan does not prevent developers from delivering PassivHaus buildings. The Local Plan does not set a requirement for this standard in the same way that it does not include a requirement to achieve specific Code for Sustainable Homes or BREEAM standards. Achieving standards beyond those required by Building Regulations will increase the costs of the development and could impact on the viability of the development. The Local Plan only requires higher standards than Building

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	Regulations for water efficiency as there is local justification for this.
	Amend wording in paragraph 4.20 to reflect the change in definition of water stress as suggested by the Environment Agency.
Approach in	Minor change
Submission	
Local Plan	In paragraph 4.19, amend the two references to 2013 to be 2014.
	Amend the first sentence of paragraph 4.20 to read:  'The Cambridge Water Company area is in an area of serious water stress as designated by the Environment Agency'

Proposed	Total: 10
Submission	Support: 4
Representations	Object: 6 (including 1 from Parish Council (PC))
Received	
Main Issues	Support
	<ul> <li>Natural England – welcomes chapter and policies requiring development to promote and ensure sustainable construction.</li> <li>Vital if people are to be encouraged to include Green Options when they buy a house. Will require agents to be well trained and fully informed.</li> </ul>
	Object
	<ul> <li>Home Builders Federation – cost implication has not been assessed. Ambiguous how might be applied. Unlikely to be feasible and safe to provide all these in one dwelling. How developers choose to achieve carbon reduction targets is matter for them. Unclear how bullet point 3 would be enforced.</li> <li>Oakington and Westwick PC – all developments over 15 dwellings should provide sustainable show home with costs displayed.</li> </ul>
	<ul> <li>No policy basis, no justified need and policy will have no material effect in reducing climate change. Measures to secure sustainably designed homes should be secured through Code for Sustainable Homes or successor standards. Delete policy.</li> <li>Building Regulations approach is sufficient. Special show homes not required and not viable. Other approaches including marketing materials and a virtual green home can be used. Favour the use of Allowable Solutions to provide greater</li> </ul>

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- sustainability benefits a local Allowable Solutions SPD should be produced. Customers wanting to go beyond national standards have other ways forward.
- Unreasonable to build a sustainable show home, however reasonable for show home to include details of options to purchasers.
  - Amend bullet point 1 of policy to: "On developments where a show home is being provided, this should include demonstrating environmentally sustainable alternatives beyond those provided to achieve the standard agreed for the development."
  - o Amend bullet point 2 of policy to: "The sustainable alternatives can be purchased when a dwelling is bought off-plan and full details of the options must be made available in the show home and positively marketed. Purchasers should be clear on where alternatives are available, why it is more sustainable, and the cost of including the alternative."

### **Assessment**

New homes can be designed to achieve higher levels of sustainability than will be achieved through meeting Building Regulations and policies in the Local Plan. The Council has introduced this new policy requiring the provision of sustainable show homes as it recognises the benefits of achieving higher standards of sustainability even though the Local Plan does not specify higher standards in its policies except for in the policies on water efficiency and the generation of onsite renewable energy. A sustainable show home demonstrating sustainable alternatives will encourage home buyers to improve the sustainability of their new home by choosing more environmentally sustainable finishes, materials, fixtures and technologies. Many buyers like to see what something will look like or how it will work before they make a decision and including these alternative options in a sustainable show home will allow them to do this. Virtual sustainable show homes will not allow this possibility in the same way.

The Local Plan does not include a requirement for new homes or non-residential buildings to be designed to achieve a specific Code for Sustainable Homes or BREEAM standard. Instead the Council is relying on planned changes to Building Regulations to progressively improve the energy efficiency requirements of new homes and Policy CC/4 which sets out a water efficiency standard for new homes and non-residential developments beyond that required by Building Regulations. The Local Plan also includes Policy CC/1 that requires all proposals to embed the principles of climate change mitigation and adaptation and Policy CC/3 which sets out a requirement for renewable energy to be generated

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onsite in new developments.

The Government's zero carbon policy is likely to require new developments to achieve zero carbon for regulated emissions using a combination of onsite and offsite 'allowable solutions'. The sustainable show homes policy will not prevent developers from using 'allowable solutions' to achieve the requirements of Building Regulations or any policies in the Local Plan. 'Allowable solutions' will provide sustainability benefits to the community, whereas increasing the environmental sustainability of your home by opting for alternative finishes, materials, fixtures and technologies will provide benefits to the home owner e.g. reduced water use or heat loss, lower heating or electricity bills. Although buyers of new homes can make changes to their properties after they have been built, some environmentally sustainable options will be easier to provide during the construction process.

The Government has recently consulted on a set of design principles for allowable solutions (Next steps to zero carbon homes - Allowable Solutions, August 2013). It will only be possible for the Council to develop its own guidance on allowable solutions once the Government has established national guidance.

The Council recognises that it will not be viable for some local housebuilders delivering small developments to provide a sustainable show home or provide bespoke homes including a mixture of options, however, where developers would already be providing a show home, the policy requires them to provide a sustainable show home either in addition to or instead of the show home.

The Council has secured the provision of a sustainable show home at Trumpington Meadows and on the Cambourne 950 development through their s106 agreements. Both these agreements set out that the measures must be offered at a price (including cost of delivery and/or installation) that reflects the same profit margin to the developers as other standard buyer's options or extras. The Council undertakes monitoring of its s106 agreements, and the sustainable show homes at Cambourne and Trumpington Meadows are working well.

# Approach in Submission Local Plan

No change

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Policy CC/6: Cons	struction Methods (and paragraphs 4.24 – 4.26)
Proposed Submission Representations Received	Total: 6 Support: 3 Object: 3
Main Issues	<ul> <li>Cambridge Past, Present and Future – support policy.</li> <li>Environment Agency – support need for CEMP given that construction is a major potential source of pollution in watercourses.</li> <li>Natural England – welcomes chapter and policies requiring development to promote and ensure sustainable construction.</li> <li>Cambridge City Council – City Local Plan makes reference to the need to comply with County Council's RECAP Waste Management Design Guide. To ensure consistent approach to waste management across sub-region, appropriate to make reference to it in this policy.</li> <li>Unduly prescriptive and inflexible. The requirement that all applications should submit supporting documents in relation to construction matters including a CEMP is unnecessary, unjustified and not proportionate to the scale and nature of proposals. The requirement will not be relevant to all planning applications and impacts and issues will vary. Policy should be amended to include threshold for provision of information. Amend policy to: "Applications for developments of 10 or more dwellings or non-residential developments of 1,000 m2 or more must submit supporting documents".</li> </ul>
Assessment	The Council's adopted planning policy on construction methods (included in the Development Control Policies DPD where it was found sound through examination) has been updated.  The RECAP Waste Management Design Guide SPD addresses the issue of waste management in new residential, commercial or mixed use developments. It provides guidance to ensure effective segregation, storage and collection of waste materials is provided for the new occupiers, it does not provide guidance on waste management during the construction process. Policy HQ/1 requires new developments to provide facilities for waste management, recycling and collection integrated within the development. A reference to the RECAP Waste Management Design Guide SPD would be more appropriately included in the supporting text to Policy HQ/1.

	The nature and extent of a new development will have an effect on
	the level of impact its construction will have on the local
	environment and amenity of neighbouring properties and also on
	the generation of waste. To ensure that this policy is considered
	when determining any planning application, no threshold is
	included, however, the level of information required to be
	submitted will depend on the nature and extent of the
	development.
Approach in	Minor change
Submission	
Local Plan	Amend the last sentence of paragraph 5.9 in Chapter 5: Delivering
	High Quality Places to read:
	'; and Car parking what works where (English Partnerships)-:
	and RECAP Waste Management Design Guide SPD
	(Cambridgeshire County Council, 2012).

Policy CC/7: Wate	r Quality (and Paragraphs 4.27 to 4.30)
Proposed	Total: 8
Submission	Support: 3
Representations	Object: 5
Received	
Main Issues	Support
	<ul> <li>Natural England – welcome policy which seeks to enhance water quality.</li> </ul>
	RSPB – support the objective to protect water quality.
	Object
	<ul> <li>Environment Agency – support the water quality and river renaturalisation policy. To ensure that the development management process progresses smoothly, we suggest some flexibility in CC/7 such that only major development proposals should comply with all aspects of CC/7.</li> </ul>
	<ul> <li>Cambourne and Caldecote PCs – a policy should be included in relation to inspection and signing off of drainage systems to mitigate against combining foul and surface water drains.</li> <li>There is a historical failure to address water issues.</li> </ul>
	Responsibilities must be agreed with all developers and water authorities BEFORE development.
	The policy should include a commitment by the Council to improve the 'ecological status' of the rivers in the South Cambs area.
Assessment	This policy is needed to ensure water quality is appropriately considered through the planning process. It can be applied as

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	appropriate to the planning application being considered, depending on the scale and issues arising.
	Some representors emphasise that drainage issues should be addressed before development takes place. Many matters are addressed at the application stage, and the policies in this section of the plan seek to ensure this takes place. However, the inspection and signing off of drainage systems is a Building Control matter.
Approach in	No change
Submission	
Local Plan	

Policy CC/8: Sustainable Drainage Systems (and Paragraphs 4.31 to 4.33)	
Proposed	Total: 9
Submission	Support: 4
Representations	Object: 5
Received	
Main Issues	Support
	Environment Agency – strongly support policy.
	<ul> <li>Natural England – support policy which promotes multifunctional SuDS.</li> </ul>
	RSPB – SuDS can provide habitat for biodiversity and can have important local and cumulative benefits for the wider water environment.
	<ul> <li>English Heritage – include a reference in the supporting text to the need to evaluate the potential impact on archaeological remains.</li> <li>Homes and Communities Agency – further supporting text should be included to confirm the arrangements for future management of SuDS for large scale new settlements and urban extensions. In this regard the HCA consider it sensible for the Council to undertake responsibility for management and maintenance of SuDS.</li> <li>Cambourne and Caldecote PCs – a policy should be included in relation to inspection and signing off of drainage systems to mitigate against combining foul and surface water drains. Consider creative use of balancing lakes e.g. watersports.</li> </ul>
	There is a historical failure to address water issues.  Responsibilities must be agreed with all developers and water authorities BEFORE development.

Assessment	Sustainable Drainage Systems (SuDs) provide a method of managing flood risk and drainage whilst securing other benefits, such as for biodiversity or amenity.  The policy seeks to ensure drainage measures are appropriately managed and maintained.
	The HCA are concerned with the adoption process. The Flood and Water Management Act envisages County Councils having a role in adopting SuDS, although this has yet to be implemented. Currently the policy seeks for an appropriate management and maintenance regime to be established, without identifying a specific body, as this will vary depending on the site. It would not be appropriate for the local plan to commit the local authority to adopting SuDs schemes.
	Policy NH/14 (Heritage Assets) protects archaeological remains; however a minor amendment to the supporting text is suggested to refer to the consideration of heritage and wildlife assets when considering drainage systems.
Approach in	Minor change
Submission	
Local Plan	Amend the last sentence of paragraph 4.32 to read:
	'They should be considered from the beginning of the design and
	masterplanning process-taking account of all opportunities and
	constraints, including heritage and wildlife assets.

Policy CC/9: Managing Flood Risk (and Paragraphs 4.34 to 4.37)	
Proposed	Total: 32
Submission	Support: 6
Representations	Object: 26
Received	
Main Issues	Support
	Natural England – welcomes policy regarding managing flood
	risk.
	Cottenham Parish Council – support elements of the policy.
	Object
	Environment Agency – support the thrust of the policy. There are some small but critically significant gaps with respect to setting out the need for development to be safe, and how this might be achieved for a range of flood risks. A Flood and Water Management Supplementary Planning Document would be a helpful way to clarify role of different stakeholders, and

- complement policies with more complex guidance.
- Anglian Water pleased to see the inclusion of the drainage hierarchy in dealing with surface water. Text should clarify that re-development sites (brownfield) are required to take the same approach to surface water drainage as new undeveloped (greenfield) sites.
- Middle Level Commissioners care needs to be taken in respect of floor levels to consider impact on surface water flow routes. Board will require an FRA in a range of circumstances set out in national guidance.
- Ely Group of Internal Drainage Boards Internal Drainage Boards should be included in list of responsible bodies in paragraph 4.37.
- Bourn and Cambourne PCs does not apply sufficiently stringent criteria to guard against flood risk to settlements downstream of any proposed new development. New settlements should include mitigation (e.g. via balancing lakes) against a 1-in-250 rather than a 1-in-100 year event. A policy should be included in relation to inspection and signing off of drainage systems to mitigate against combining foul and surface water drains.
- Cottenham PC SFRA should be updated to reflect latest guidance. Paragraph 4.35: refers to the EA and its maps and available web-site. The policy would be better served if it were to include the specifics of flood zones 1, 2 and 3 as detailed in national policy documents. There should be specific reference to individual internal drainage boards to be consulted.
- In part 1a, proposed floor levels should be based on flood levels, not on existing site infrastructure and roads.
- In part 1c, the text as currently drafted would have the effect of seeking to restrict the surface water run off rates for new developments on all sites, including brownfield sites, to below the equivalent greenfield run off rates for an undeveloped site. This is not appropriate and may well not be feasible.
- There is a historical failure to address water issues.
   Responsibilities must be agreed with all developers and water authorities BEFORE development.

### **Assessment**

The policy provides a framework for addressing flood risk, adding detail to the policy approach established by the National Planning Policy Framework (NPPF).

Regarding part 1a, the starting point for consideration of proposals is the application of the sequential and exception test that are central to the NPPF. Only when this has been applied would the second part of part 1a be applied. It would be helpful if this formed

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a separate paragraph in the policy, and this would address the concerns of Cottenham Parish Council.

The second sentence of part 1a is based on Environment Agency advice and good practice, and is a sound policy requirement. Ensuring safe floor levels is a sensible precaution in all areas. Impact on flow routes would be an issue to be considered through a Flood Risk Assessment.

Regarding part 1b, a change is proposed reflecting the Environment Agency concerns, reflecting paragraph 102 of the NPPF, to ensure safe occupation, access and egress.

Regarding paragraph 1c, it is appropriate for the policy to seek to achieve greenfield run off rates, as development can offer an opportunity to reduce flood risk where higher run off rates are taking place on brownfield sites, and avoid increasing risk from development of greenfield sites. If it cannot be achieved, or is not appropriate for biodiversity reasons, this can be taken into account, but it should remain the starting point.

A Supplementary Planning Document, prepared in consultation with stakeholders, would usefully assist implementation of flood management policies. In particular the County Council as lead flood management authority can assist its preparation. An amendment is proposed to reference this.

The requirement to ensure that flood risk to downstream property is not caused or exacerbated as a result of development is included within the NPPF (para's 102, 103) and NPPF Technical Guidance (Paragraph 6) to which the Policy CC/9 refers. This incorporates the requirement for predicted impacts of Climate Change to be factored into the calculations for balancing facilities / mitigation measures. There is no evidence to support planning specifically for a 1 in 250 year return event referenced in one objection.

The Strategic Flood Risk Assessment will be periodically updated. There is sufficient flexibility in the policy, which refers to the current document and successor documents.

Amendments are proposed to provide further clarification regarding the role of Internal Drainage Boards.

# Approach in Submission Local Plan

## Minor change

Amend criterion 1a to split it into two sections - a separate policy

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element for each sentence.

Amend the first sentence of criterion 1b:

'Suitable flood protection / mitigation measures are incorporated as appropriate to the level and nature of risks, and which can be satisfactorily implemented <u>to ensure safe occupation</u>, <u>access</u> and <u>egress</u>.'

Amend criterion 1c:

'There would be no increase to flood risk elsewhere, and opportunities to reduce flood risk elsewhere have been explored and taken (where appropriate), including limiting discharge of surface water (post development volume and peak rate) to natural greenfield rates or lower,'

Add to the end of paragraph 4.36:

'A flooding and water management Supplementary Planning
Document will be prepared in liaison with stakeholders to
assist developers and key stakeholders with the effective
delivery and implementation of the policy.'

Amend the first sentence of paragraph 4.37:

'The appropriate responsible bodies including the Environment Agency, Anglian Water, <u>Internal Drainage Boards</u>, and Cambridgeshire County Council should be consulted, as appropriate.'

Add to end of paragraph 4.29:

'Maps showing the area covered by individual Internal Drainage Boards can be found in the Council's Strategic Flood Risk Assessment.'

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